Case 2:25-cv-00053-FMO-BFM Document 44 Filed 02/09/25 Page 1 of 107 Page ID #:1428

1. Introduction:

I, Marc Wolstenholme, am the plaintiff in this matter, representing myself pro se. This declaration is made in support of my PLAINTIFF'S MOTION IN LIMINE TO ADMIT EVIDENCE, to submit additional evidence relevant to my claims against Riot Games, Inc. for copyright infringement, unfair competition, and intentional infliction of emotional distress.

2. Evidence Submitted:

I submit the following evidence of CONTENT OWNERSHIP COMPARISON-BLOODBORG: THE HARVEST & ARCANE SEASON 1, EPISODE 1. This is not an exhaustive list, but serves to demonstrate key elements of my original work and the substantial similarities between my work and the infringing material produced by Riot Games, Inc.

Exhibits

Exhibit A. Analyzing Arcane, S1, E1, "Welcome to the Playground." First frames, and opening battle scene on bridge between Piltover and the underbelly of Zaun.

Hook- The hooks of both works is the duality of haves, and have nots, and the conflict between polarizing states of living, of mind, and of people. The Bridge scene, as the hook, showcases the trauma, conflict, duality and journey to come.

A1. Statue symbolic of murdered parents.

In Arcane there are no characters with Indian ancestry. The opening scene of episode 1 shows the face of a crying statue with clearly discernable Indian features. These statues are symbolic of the death which has taken place on the bridge during the battle in which Vi & Powder's parents were murdered.

In Bloodborg, Rook, whose POV is alleged to be strikingly similar to Vi's storyline in season 1, is of Indian ancestry, and Rook's parents were murdered up on the gangways.



PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

A2-Bridge Dumping (Set-Up)

In Arcane, During The opening battle scene on the bridge between Piltover and the underbelly of Zaun, we see mass bridge dumping including streets signs, a library of books strewn across the bridge, dead people, a person tied to a chair, banners, boxes, and other stuff. The presence of the abnormally littered bridge suggests that during these Riots people carried things to the bridge to dump. This historic event, when the girls were very young, marks the beginning of the current divide and conflict between the two cities. The Undercity is smog-filled, and the Enforcers wear gas masks. The rich built their towers high, evading the smog.













PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

In Bloodborg, there is an historical event which marked the beginning of divide and conflict, and state independence between New Kowloon (Manhattan) and The Assemblage (Mainland USA). This infamous event is coined "The Great Bridge Dumping"

In The Bloodborg manuscript, the Plaintiff wrote:

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"Despite the problems and the warnings, the Super-rich relentlessly continued building their skyscrapers up, reaching far above the clouds, like stems of plants emerging from the soil, stretching up, competing for sunlight. The ground level smog became unbearable. It lingered at its mistiest around head height, choking thousands of poverty-stricken people to death. The Super-rich were largely unaffected by the smog as they lived high in their sky towers. The gangways, monorails, and sky-rails were built higher and higher to escape the deathly low laying pea fog and radioactive waste fumes extracted from the pipes of Assemblage mainland. Until, The North Atlantic Oscillation lowered, moving south, freezing Manhattan and bringing with it, hurricane Alorra, which ripped through Manhattan whipping up the smog. This is when Manhattan gained the nickname; Man Hat-man, because its residents were forced to wear face hats, hoods or masks to protect themselves from the smog and toxic air. Many of the broken buildings were abandoned to rot, others were bolted together with massive rods and steel beams or cables to prevent them from falling over. Manhattan was soon a metal web. Mainland America refused to help the now independent state. The mainland refused to continue taking in Manhattans rubbish. Manhattan's residents responded with a mass protest, coined, The Great Bridge Dumping. They carried the rubbish bags, broken street signs, dead bodies and

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whatever else they could lift to Manhattan's several bridges, dumping their rubbish and rubble into the Hudson river. Mainland America responded by netting off the river around Manhattan, so that most of the waste couldn't escape. Mainland issued Manhattan with a declaration of war, stating that Manhattan was damaging both America and the environment. The people of Manhattan responded by building barriers of rubble and rubbish on the bridges. Mainland responded by blowing up most of the connecting bridges around Manhattan. The country was divided on what to do. Other states began to seek their independence from America. Then after several unidentified terrorist attacks had brought Manhattan to its knees, full-scale war and panic spread throughout all the states of America. Each state's primary concern was protection, they each constructed defensive walls, like Trump's walls-build to keep out the Mexicans. Manhattan was left to crumble and sink. Ground-level became so polluted that it is now uninhabitable and submerged. The people of Manhattan toppled the Super-rich and tried to rebuild. They renamed it New Kowloon and tried to govern themselves, until global nuclear and biochemical war sent the world into a new dark age. Lawlessness grew from chemical ashes. Insanity spread within the fumes of war. Mutation and disease plagued the streets."

Similarities – Historical bridge dumping and riots as the "Set", marking the beginning of the conflict of both stories. In writing theory, the setting is the physical setting, the environment and its conditions. Both settings are smog-filled warring sister cities with stark divide between rich and poor. Both have a chemically choaked underbelly and an oppressive over city. These settings are evidently remarkably similar, Yet the "Set" of the Bridge riot/dumping Scene as the catalyst is more strikingly similar and distinctive than chance would have it. The "Set" here is used to Set the tone of the whole book and equal in the animated show. It's dark, gritty, dirty, fractured, traumatic, chaotic, volatile, diseased and dammed, in both, the way forward, out of conflict, is masked by smog, denoting a difficult and traumatic quest or journey ahead for the characters. The Bridges represent a crossing, a line which once crossed, can never be regained. They represent a journey from one thing to another, a transition from one state of mind or being, to another state of mind or being. In both stories, the bridge riots are the beginning of the "Set-up." In writing structure, the Set-up is exposition. The exposition provides background information to the reader, setting up the characters, world, and basic premise of the story.

In a separate document of evidence- PSYCHO-EMOTIONAL ANALYSIS OF TRAUMA IN ARCANE. TAKEN FROM BLOODBORG, WHICH IS TRAUMA WRITING

In a separate document of evidence- PSYCHO-EMOTIONAL ANALYSIS OF TRAUMA IN ARCANE. TAKEN FROM BLOODBORG, WHICH IS TRAUMA WRITING DIRECTLY REFERENCING MY PAST AND MY MEDICAL RECORDS- The plaintiff will explain the Psycho-Emotional Analysis of the Bridge dumping scene and what it means. In short, the crossing of the bridge is a personal metaphor denoting a difficult transition from military life to civilian life, carrying trauma and trying to dump it to rebuild a life post war and conflict.

The bridge dumping in Bloodborg is a metaphor for trauma, insanity, corruption of the body and mind. In Arcane it is alleged to set up the same, without such insights.

A3-Vi's parents dead on the Bridge, Vander carries the children away.

In this example the plaintiff will use facts to demonstrate how Arcane's main storyline is strikingly similar to two parallel, story circles of the Bloodborg: The Harvest manuscript.

Arcane S1, E1, directly after the Riot on the bridge, we see Vi's parents dead on the bridge, Vender carries the children away.







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In Bloodborg: The Harvest, we see two parallel, story circles of dead parents being the trauma to ignite the central internal conflict in the characters. In writing theory and story structure, these events are often termed Inciting Incidents.

Dream sequence, from Rook's POV-

"In the dream a slender, glossy haired Indian woman was tending a frying pan over a metal bin fire in an apartment, the glassless window of the apartment looked out onto a grim view of the Needle District's lower platforms.

The woman wore a traditional red sari with elaborate gold patterns. Around her neck she wore a baggy maroon scarf. The woman looked over her shoulder and smiled at an Indian man with jet-black hair and moustache to match. He was sat on a sideways oil drum looking at the chess set in front of him on a coffee table. He twisted the tips of his thick moustache as he deliberated his next move with a smile.

A toddler with piercing blue eyes sat at his feet, wearing only a fabric nappy. The young one was playing with the white rook chess piece, hitting it against the floor then chewing it. The Indian man bent down to take the rook out of the toddler's mouth.

The Indian woman's smile dropped to horror as the apartment door kicked open and Feral Fighters marched in. She ran towards her family diving to shield the baby as the first shots rang out. A barrage of shots drilled through Rooks sleeping mind, producing familiar night tremors.

When the shots stopped, the Feral Fighters departed as hastily as they had arrived. The Indian man and woman had cocooned the baby with their bodies. Their bullet-

ridden bodies slumped down to the ground, revealing the unharmed baby, still grasping onto the white rook chess piece.

The toddler sat in a pool of its parents' blood, shaking them both and crying out.

Momma Grace ran into the apartment, sliding on the gore. She picked up the tot, carefully wrapping the toddler in the Indian woman's maroon scarf and ran out, leaving a trail of bloody footprints behind.

Mum and dad's blood-soaked eyes drilled into Rook's mind. Rook woke up on the roof platform, shivering and sucking on the Rook chess piece. It had begun to rain. She walked inside and lay on the floor. "

Jade's dialogue in Warwick's POV in Bloodborg.

"Morgan has been running from them for longer than you have been alive, he has saved hundreds of children and mothers. Morgan saved me as a young child, I was only six years old. He has been a father to me since. A gang of mercenaries came for my blood, they killed my mother and father, they were taking me away when Morgan and his gang showed up."

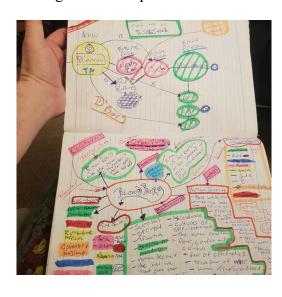
In these two POV examples, we see the same traumatic events told by two different sufferers. One in a nightmare and one in dialogue. This cyclical storytelling of trauma is utilized in extraordinarily similar ways in Arcane and Bloodborg. Moreover, the actual traumas and repeated events in Arcane are extraordinarily similar to those of Bloodborg. Thus, we have extraordinarily similar advanced storytelling techniques, telling extraordinarily similar traumas, not just in the inciting incidents, but through the whole of both Arcane and Bloodborg, such as

dead parents, falling, drowning, comas and more. The repetition of story beats and traumas is a nested or cyclical literary device to show importance and to remind readers of the internal conflict. It also serves to represent the recurring and nightmarish revisiting (Flashbacks and intrusions) of traumatic events.

Similarities- The stories have now been demonstrated to have strikingly similar "hooks", and the beginning "Set-ups", "Sets" and "Settings". Moreover, the Inciting Incidents of Rook's POV in Bloodborg and of Vi's and Powder's POV in Arcane, which ignites the central internal conflict in the characters, and sets the tone and conflict of the storytelling, are the same (Dead parents). The stories use extraordinarily similar advanced storytelling techniques, telling extraordinarily similar traumas. The similarities go far deeper than a surface lift.

It should be noted that Bloodborg has an interwoven, nonlinear and complex story structure of six intersecting POVs from three central locations, each with their own story structures. Thus, the stories can be dissected and told individually or told in different orders. Evidence of the sorting of sections can be seen in these images of development.





A4. Ordering scenes of Bloodborg and Arcane.

As stated, Bloodborg has an interwoven, nonlinear and complex story structure of six intersecting POVs from three central locations, each with their own story structures. Thus, the stories can be dissected and told individually or told in different orders. To dissect the stories to find the central conflict, one would need to only have a very basic understanding of story structure.

In Arcane: Bridging the Rift, The Making of Arcane, Amanda Overton (a writer brought in to help fix the problems) told Linke and Yee (Writers of Arcane and Showrunners) that they need to change the pilot and opening scene to the Bridge scene.

A pilot is the first episode, or snippet, of a TV show, designed to introduce the story, main characters, and style to audiences and networks. Often, it serves as a test to determine whether the series will proceed with a full season. Pilots establish the core premise, setting, and tone of the series, aiming to engage viewers and demonstrate the show's potential for success. If well-received, the pilot can lead to a series order, where additional episodes are produced for broadcast or streaming. Thus, at this late state, the two showrunners still had not figured out the story and had not been able to gain funding (greenlit). Linke and Yee had the frames where Silco falls into the water as the pilot, in early to mid-2021. This shows that they still didn't know what the story was. This shows not even a basic understanding of story structure.

In episode 2 of Bridging the Rift, Amanda Overton stated, "I'm quite proud of the cold opening, to like the whole beginning of the season with the bridge. The cold open used to be the cold open to episode three, when Silco was drowning (Also remarkably similar to a cyclical traumatic event in Bloodborg and of the Plaintiff's personal trauma).

Amanda Overton continued, "I sort of went out on a limb, being, like, so guys I know you hired me to help out with the show and whatever, but... you need to change the pilot. That's a lovely poetic image right (Silco drowning) but it wasn't telling the story of the series, which is, these two sisters torn apart (By the inciting incident which is the internal conflict set on the Bridge with the death of their parents)."

In Arcane: Bridging the Rift, Part 2 - Persistence (Or When Your Best Still Sucks), Linke says "That's when they found Monica Macer. She was a showrunner. She worked on Lost." Monica Macer was working on MacGyver during Lockdown, 2020 and into 2021. All indications show that Macer worked for Riot in 2021. Monica taught the "Showrunners" the basics of crafting a scene and making a show, and how to develop characters.

Bridging the Rift, Part 2, In Melinda Dilger (who joined Riot in 2020 to help make Arcane) rolled out a production Schedule, starting, backdated to March 2020. She then overly states for the camera, "That's when this started". But the date in the top corner is 3/16/2021. MARCH 2021. Melinda Dilger states, "Because this is the first Riots ever done, a lot of things are getting figured out and developed as we go along in production."

31 May 2023, after leaving Riot to go to Netflix, Melinda Dilger - Producer of "Arcane" and Global Head of Animation Production at Riot Games- appeared on Angle on Producers with Carolina Groppa podcast: https://podtail.com/podcast/life-with-caca/melinda-dilger-producer-of-arcane-and-global-head-/0 Melinda states that they had already established a look for the show. (the gorilla look). They didn't have an efficient pipeline. Fortiche was still working out their pipeline. Fortiche had their hands full figuring it out, so she built an

infrastructure for the LA team. She states that Mark Taylor was consulting them at the point when she joined. She discussed the mess of it with Mark. So she had to build them a basic org chart for what it should look like. And taught them the very basics from beginning to end. She even had to assign people to their skill sets. She said it was a lot, it was casting the right people, building a team, hiring people, step by step, work chart, schedule, budget, pipeline, all of those things had to be done and figured out, bit by bit. She states that other than team building, which they didn't even have, she had to do the very basics.

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The plaintiff states, how can we trust that showrunner Christian Linke (a nonwriter), who claims to have written the Arcane show, and his buddy showrunner Alex Yee, wrote Arcane when they do not even understand the central conflict of the story, or what their inciting incident is, never mind basic character development. If they wrote the show, how do they not know their own story and characters.

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A5. Vander carries the children away.

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In Arcane, to end the opening bridge scene, Vander carries the children away. Vander becomes an adoptive father to the sisters and two others (Mylo and Claggor). Vander acts as a moral compass for Vi, teaching her about responsibility, leadership, and the consequences of violence.

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In Bloodborg, Momma Grace carries Rook away and becomes an adoptive mother to Rook and two others (McCauley and Mateo). Momma Grace acts as a moral compass for Rook, teaching her about responsibility, leadership, and the consequences of violence.

"Momma Grace ran into the apartment, sliding on the gore. She picked up the tot, carefully wrapping the toddler in the Indian woman's maroon scarf and ran out, leaving a trail of bloody footprints behind."

In Arcane, Vander is a prominent and notorious hero or leader figure in the Undercity, specifically in Zaun. He is an aging stocky fighter who many believe is past his ability to protect the street children and keep the piece. He has many underhanded trading, bartering, negotiating and dealings with all kinds of shady characters. Vander is a former revolutionary who once led a rebellion against the oppressive rule of Piltover, but after seeing, and experiencing the devastating impact of violence and war, he abandons the life of a fighter, but his history and conflict eventually catches up to him. Vander is later turned into a werewolf called Warwick.

In Bloodborg, Warick is a prominent and notorious hero or leader figure in the Undercity, and in the Mouth district. He is an aging stocky fighter who many believe is past his ability to protect the street children and keep the piece. He has many underhanded trading, bartering, negotiating and dealings with all kinds of shady characters. Warick was a military officer of the Ark Defence, turned to an extreme revolutionary who once rebelled against the oppressive and murderous rule of the Ark after experiencing the devastating impact of violence

and war, towards his own family, he abandons his post, going AWOL and blowing a hole in "The Wall," which came to be known as "The Rupture." The only time in history which the wall was breached. As this attack on "The Wall" was committed, Warwick is mysteriously teleported away to New Kowloon where he makes a new life, of relative peace, as much as is possible in a lawless environment, like New Kowloon, or its counterpart Zaun. But Warwick's history and conflict eventually catches up to him. "The Rupture," in Bloodborg, will later be shown to be remarkably similar to Jayce's attack on the anomaly in Arcane. As this attack on the anomaly was committed, Jayce is teleported away.

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Similarities- Both Vi and Rook are carried away from the deaths of their parents. Both are adopted by the protective parental figure who rescued them. Both are later nurtured to become leaders, both are taught to fight, but only for protection. Both of these parental figures are later killed, repeating the same cyclical story beat, again, as explained in section A3.

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It is alleged that the story beats, mannerisms, personality and whole character concept structure of Vander is taken from Warwick from Bloodborg, but this will be explored in a comparison of the two in another evidence document.

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Exhibit B- Arcane S1 E1, after the intro- Vi Climbing/ Parkour.

After the traumatic bridge scene, and Imagine Dragons music intro, Arcane shows Vi's opening parkour scene and we see many of the characters behaviours for the first time. Vi is now of Tween age which is the same age group as Rook in Bloodborg who is alleged to be Vi's counterpart.

B1. The Climb.

In this scene of episode 1 of Arcane, we see Vi climbing a building. She adjusts her slipping hand position finding a better grip, she poses on her fingertips, ready to spring up. She springs up to her next position but her right foot slips. She repositions the weight on her left foot and allows her right foot to dangle to counterbalance. She uses the momentum, slightly bending her left leg, to leap up to a pole for a firm hold. With a firm grip she takes a moment to protectively check on the others (Powder, Mylo & Claggor) below her, each climbing on poles, metal panels and walls. This already signifies her leadership role.











The Plaintiff commends, this climbing scene is remarkably detailed and accurate, down to the fingertip leveraging and the counterbalance weight bearing and using the dangling leg as momentum. The Plaintiff believes this scene is brilliant.

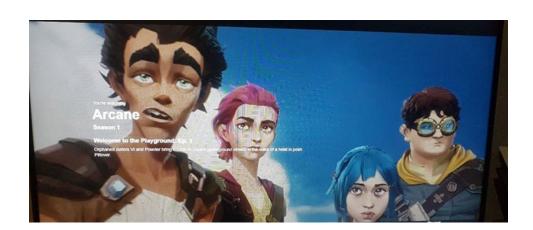
In Bloodborg, Rook, who is alleged to be Vi's main counterpart, is also a skilled climber and parkour runner. The Plaintiff also wrote several climbing scenes In Bloodborg. As a former boulderer and climber, The Plaintiff wrote counterbalance and leverage techniques into some of these scenes.

Warwick's POV- "He lowered his left leg, allowing it to dangle, he swung it about, hoping to find a pipe he could shimmy down to. The fingertips of his hand slipped away as his left foot found a crack in the cement wall. Pushing off the crack with his toes, he regained his grip."

Similarities- Both Vi and Rook are skilled climbers and parkour runners. Yet the scene from Bloodborg which is a remarkably similar match to this Arcane scene is one from Warick's POV, suggesting the "Pix N Mix" method of lifting narratives and IP. The difference in this extract of writing is the switch of left to right leg dangling. The similarities in this second scene go beyond coincidence. From two, supposedly unrelated pieces of work, we have a leadership figure of the group, female tween climber and parkour runner, protective over two adoptive brothers... in both. Arcane adds in a younger sister. Thus we can see from the very outset that the characteristics, psychological and physiological skills and sets of Vi and Rook are remarkably similar. This demonstrates micro similarities in the macro structure of these two (Vi and Rook) characters, their personalities and their narrative arcs.

Additionally, the climbing snippet of Warwick's POV, shows the micro details of writing, down to the counterbalance and leverage climbing techniques being remarkably similar in implicit detail.

B2. On the Roof S1, E1- Vi and Powder and Vi's Orphaned brothers / friends Claggor and Mylo.



In this scene, we see the four children (3 in Bloodborg but there are younger gangway children) standing on the roof together. It should be noted that both Claggor and Mylo were shown in the pilot / 10 year anniversary video in October 2019.

At this time Bloodborg was long written, partials and almost full manuscripts and synopsis had been circulated. Some literary and talent agencies, such as Curtis Brown Group and Riot Forge, were taking submissions via their online portals, as opposed to, or alongside, email submissions.

Yet the Riot Games 10 year anniversary video did predate the main round of submissions in early 2020. The Plaintiff states that he can show evidence that some form of work on the animation for the 10 year anniversary video began At Fortiche Production SAS, the French animation studio headquartered in Paris, in the Summer of 2019.

The Plaintiff can also evidence that Riot Games has a history of retconning and backdating work and "IP" to fix problems, perhaps hide theft, and to bring narratives and

characters aligned to new directions and stories. Moreover, it has been reported that bugs, hackers and other methods make it possible for people and organisations to change a video's upload date and content on YouTube and other platforms. Riot Games has a history of conducting recruitment campaigns, to solicit hackers and paying them to crack codes, find weaknesses and cheats and bugs in their games.

The blow link is an article about one of Riot's campaigns to entice and rewards would-be hackers that find vulnerabilities in the code. The article states, "Riot Games, the makers of Valorant, have been vocal about their desire to crack down on hacking and maintaining the game's integrity. But they've taken it a step further and have now hidden a message in the game that can land you some steady income."

https://www.thegamer.com/riot-games-valorant-anti-cheat-secret-message/

Both Riot Games and Fortiche have histories of placing hidden messages and Easter Eggs or Visual cryptography in their work. This should be noted for later evidence.

Below is the code from the article.



This information is significant to these Copyright Infringement cases because Riot

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of swiping, perhaps both code and content (IP), as well as a history of actively recruiting hackers. Thus, bringing characters and content aligned to backdate and to swipe, is easy for them and it's a well-rehearsed task.

Vi's orphaned brothers/ friends Claggor and Mylo are remarkably similar to Rook's two orphaned brothers/ friends, Mateo and Macaulay. Please see the overview

comparison of these characters, filed and dated January 20th, 2025- PLAINTIFF'S MOTION IN

LIMINE TO ADMIT EVIDENCE- The two Brothers.

Games is a tech giant with a history of backdating stories and information and a proven history

Let's see how they match up (Few examples) from the Bloodborg

"'Quick, someone turn on the interceptor to see if they followed Rook,' said

Mateo, pointing to the interceptor with a stout finger, rolls of fat coiled at his nape as he tilted his head.

The group of Gangway children sitting on the floor in a semi-circle, all turned to face the makeshift digital radio.

'I'm on it like boom sonic,' called Macaulay, already scrambling to the Interceptor, his shabby blonde hair sweeping the communications display as he reached for the headset. Nobody could operate the interceptor quite like he could, he had built it after all, not from scratch but he had improved it and maintained it since he was eight years old. He had devoted five years to this communications system, he didn't appreciate others playing around with it, not whilst he was here to operate it."

(The only difference is Macaulay's hair color)

Later

"'Did you get that Mac,' said Mateo, pointing a sausage finger at the speaker.

'Yeah, obviously I have, I've got it all recorded, but I'll be damned if I know what Cowboy was talking about. He speaks too fast,' said Macaulay giving Mateo the thumbs up."

B3. Metallic Blimp.

In Arcane, as Vi, powder and one brother stand on the roof, we see a metallic blimp fly overhead. Later, in act 2, we see the fighlights (Resistance) attack an airship and find it call of the biochemical drug/ weapon called Shimmer.







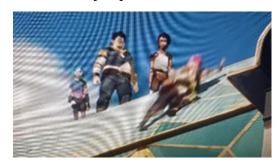


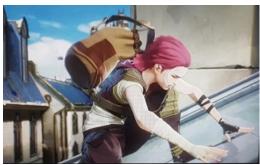


The Plaintiff argues, that, if you take his narratives (Words), cut it up into single sentences- like the one stated above- or whole scenes, write them on post-it notes "Pix" all the ones you like, then "Mix" them up and rebuild them, and force them into cardboard characters, you end up with this one scene being a story beat, just like the above shown images of Arcane, which show flying metal monsters fully laden with biochemicals (Shimmer). This essentially demonstrates the "Pix N Mix" method of IP theft.

The Plaintiff argues that that one sentence has undergone creative choices and visions, in writing rooms, then translated to animation, and still after all of this masking, it is plain to see the astonishing similarities. The Plaintiff argues that one or two from a manuscript to a visual art medium might be coincidence or passable, or even just inspiration, but when they stack up, into thousands of coincidences, it's called IP infringement. The Plaintiff will state one after another after another. The similarities are alleged to stack astronomically beyond chance or innocent inspiration.

Both Rook and her alleged counterpart, Vi, are skilled climbers and Parkour runners. Directly after the flying metal monster images, Vi performs impressive parkour skills, with slides and jumps.





Vis roof slide and jump

This is a major part of the characterization and storytelling of both young Vi in Arcane and Rook in Bloodborg. For a deeper dive into the striking similarities of these two characters, please see the document titled, COMPARISON OF CHARACTERS FROM ARCANE & BLOODBORG. WITH REFERENCE TO POV'S FROM BLOODBORG AND PSYCHO-EMOTIONAL ANALYSIS. VI VS ROOK, PLUS ELEMENTS BORROWED FROM OTHERS IN BLOODBORG, which was filed on JANUARY 15, 2025.

It is alleged that Vi's movements, skills and actions closely mirror those written into Rook's POV in Bloodborg. For written examples:

From Bloodborg,

'I slid down a roof ledge and performed that rolly jump I do, you know the one, I skidded in through the blue tarpaulin.'

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

Later

'I've intercepted Feral Fighters with poor radio discipline. Their talking about a runner boy who they couldn't catch today. These fools couldn't catch their reflections in the mirror, never mind catching our Rook,' said Macaulay unplugging his headset for all to hear.'

Later

'I'm sure Mat. There isn't a person alive who can navigate the skies of New Kowloon like I can. Mac could you plan me a route to Lugar dal luz popping off three or four of the jammers on the way.'

Later

The dawn sun sat low between the needled pricked skyline, like a fiery tracer round shot far into the distance. The two moons above hung large and full in the sky: the powdery grey moon set far in space and the metallic darker grey moon set nearer- more menacing.

Rook crouched on the steel corner of a rooftop - a modern-day hooded gargoyle, silhouetting in the fine smoky clouds.

Later

Rook cleared a big jump which two of the three fighters fell, one clear missing it and the other smashing his face into the rusty metal rail, then dropping onto his head on the gangway below.

From the Bloodborg Synopsis

Rook's POV is also narrated in the close third. Rook is living in the Needles

District of New Kowloon. No gender pronouns are used in this narrative until Rook, thought to

be a boy, is revealed to be a girl. Rook must disguise herself as a boy to stay safe in her neighbourhood. Rook is a sky parkour runner who ... Rook runs around the city disguised as a boy, destroying the jammers.

Similarities, in these two characters we see the same skills, characteristics, rolls and jumps. This is a major part of the narrative of tween Vi, which accounts for the first act, first 3 episodes of season 1. In Bloodborg, Rook is more skilled in these areas, and they appear more in her POV. Indeed, these parkour skills are central to Rook's mission and survival in Bloodborg.

Conflict, Vi was introduced as a playable character, or "Champion" within the LOL game's lore in December 2012, since 2016 she has had a number of backstories which have undergone many updates, up to, and past, the 10-year anniversary video in October 2019, which introduced Riot's desires to make an animation show. Even the backstories updated at this time in late 2019, do not align with or even hint at the Vi we see portrayed in act 1, nor any parkour skills in her past. Moreover, Vi's inconsistent in-game backstories do not align with the Vi character we see in Arcane, particularly her early life.

B5. Arcane Vi and Arcane Lore are not from the LOL games.

In the past lore backstories of Vi, updated in late 2019, supposedly when the show was being made, although it was not greenlit, she is described as a "Punch first, ask questions later" hard girl. She spent time in an orphanage which burnt down, then she joined a criminal gang and robbed a mine, trapping the miners in. Then she punched down a wall to free the

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miners, because she was a "good criminal", then "laid a beat down on the gang", then fled to Piltover (which was still separated from Zaun on the map) and then became a "Bad Cop." It's all trope and trope and cliché and trope layered on thick, with no proper characterization or character development. The inconsistent backstories and narratives are paper-thin. She is not the Vi from Arcane and is only recognizable because of her bright pink hair.

The Plaintiff, notes, if the Arcane Vi was already planned, why are Riot investing in inconsistent, and even conflicting narratives at the same time? And now all that work has been retconned because Arcane is the new cannon lore. Moreover, if effectively deleting years of the work of many creatives, isn't bad enough, all of the narrative writing teams, and Riot Forge publishing teams, were let go in January 2024, accounting for 11% (Over 500) of Riot Games's LA work force.

C. BlueBeam and Eyes- The Blue Energy Balls from Arcane were also a concept of the Bloodborg Manuscript.

In the Bloodborg Manuscript:

'The second wave of the mutated were now climbing the fence. Warwick took a marble like glass electromagnetic ball from his jacket pocket. He threw the ball at the mutants on top of the fence. It struck one mutant on the forehead. Detonating on impact, an electromagnetic pulse shot out in all directions, exploding all the mutant heads it reached, in an instant. The headless bodies, simultaneously flopped down on the fence, pulling the fence down with them.'

In Bloodborg, the electromagnetic balls that Warwick uses are primarily used as a weapon with devastating effects and a teleportation energy, combining advanced technology with a dramatic, energy-based destructive force. The concept of a small, handheld blue marble-like device that unleashes immense power upon impact is strikingly similar to how the Hex Crystals work in Arcane, which is not how they were portrayed before Arcane. In Bloodborg, these blue electromagnetic balls are made in a more scientific realism way, than in Arcane.

In Bloodborg, the balls are tied to a deeper aesthetic and a deeper energy which powers many of the devices and technologies in the manuscript. Blue and Eyes are a function of the storytelling in Bloodborg, and it's alleged that Arcane also "Swiped this specific use of aesthetics. The energy / technology system is called BlueBeam, although it isn't explicitly named as so, but is repeatedly used in many POVs. The same energy is used in the forearm device of D'borg as a type of energy mapping system and integrated command system with many functions. It also powers D'borg's blue laser eye. It is also used to open eye portals and teleportation windows.

C1. To divulge narrative secrets to the court for the sake of transparency,

One of BlueBeam's literary functions is a satirical play on the Project Blue Beam conspiracy theory. If you go to the M.W. Wolf webpage, it can be observed that much of the M.W. Wolf catalog has satirical undertones.

In Bloodborg, BlueBeam energy is tied to blood energy and blood engineering, but this is implicitly implied in the manuscript. In short, the energy is a mix of Fusion energy,

Blood engineering, electromagnetic and higher consciousness. It is used for weapons, to open inter dimensional portals, quantum entanglement and transportation via teleportation.

Bloodborgs are created via the same, yet in the manuscript, even the blood engineering goes deep into the science, describing how early state embryos produce trophoblasts and these are harvested from blood. BlueBeam, portrayed via technologies, aesthetics and eyes are therefore major plot and structure features of Bloodborg.

Yet the use of said literary devices goes even deeper. The M.W. Wolf Megaverse of Fiction books are interlinked in a spaghetti-like universe, much like Stephen King and Brandon Sanderson have achieved. BlueBeam and using eyes as a storytelling device ties into The Inverted Organelle theory of consciousness and the universe (IO-CU). The IO-CU is a real-life scientific theory of everything. The IO-CU also underpins all of the M.W. Wolf Megaverse of Fiction. Eyes are organs of the body which connect consciousness and the internal universe to the perceived outside universe. Eyes are the organ in which reality is inverted.

https://www.mwwolf-fiction.co.uk/the-inverted-organelle

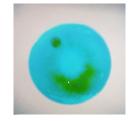
Thus, these elements of Bloodborg, also in Arcane, are not just uses of an eye or a blue ball to look cool. The meaning and use in the story goes far deeper than anything which could be perceived as chance. Yet, in Arcane, they flash eyes but do not link it to any meaning, and even Hex tech is left ambiguous, seemingly retconning Riot's history of Hextech.

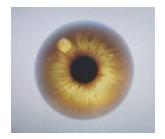
C2. Hextech Crystals and eyes in Arcane











The Plaintiff alleges that Arcane creators saw an opportunity to make these electromagnetic balls into their Hex Crystals. Again, this is the "Swipe N Gripe" method to amalgamate IP into one to hide the theft or infringement. It is alleged that the "Swipe, is the taking of the content, the "Gripe" is the masking or adulteration of the content to merge it with existing content. It is alleged that this is where the "Treasured Gateways" policy helps to backdate false ownership or intent.

The transformation of Bloodborg's Bluebeam concept from an electromagnetic pulse and transportation technology to a magical energy source is alleged to have given Riot Games the creative freedom to re-build the lore, style, use and origins of hextech.

The Blue Energy Balls from Arcane have a distinct visual and conceptual identity tied to hextech and the magical essence that powers the world of Runeterra. The crystals, however, take on a more mystical and magical approach, powering technology through magical energy rather than the electromagnetic pulses of the Bloodborg manuscript.

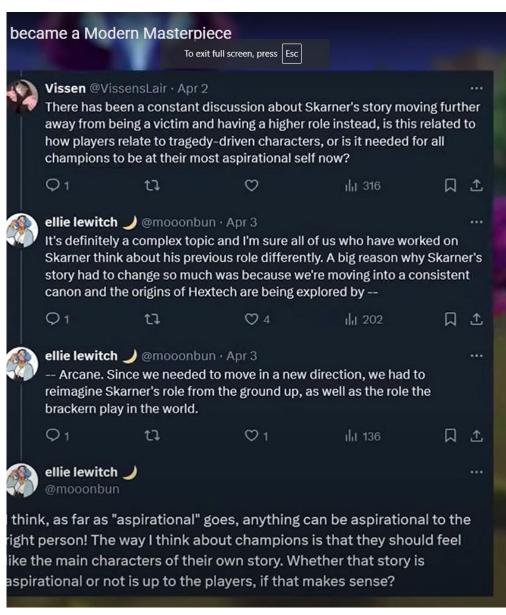
Hextech in its in-game forms, long predates the circulation of the Bloodborg manuscript. However, its portrayal, origins and use in Arcane is far different to its portrayal in the LOL games. This will be explored and evidenced in a separate document. In short, in the Games lore, Hextech is powered by Hex crystals which come from the magic souls of giant purple crystal scorpions called Brackern.

In Arcane, this isn't the case. In Arcane, Heimerdinger states that Hexite crystals are created by putting Galsite under immense pressure. Jayce presents his Hextech research to the Council in Piltover. During this scene, Jayce mentions Galsite. Some long-term content creators of Riot Games content, have expressed concern that Arcane's use of Hex crystals, being a mined gem, essentially eradicates the lore of Brackerns. This retcon has also presented many more problems for Arcane, including the lore of Seraphine, who was released in League of Legends on 29th October 2020.

It begs the question, why are Riot Games releasing characters if they are also working on Arcane which usually deletes her lore?

C4. Hex-con – Hextech retcon.

In the posts below, Ellie Lewitch of Riot Games explains that Skarner's lore had to change significantly as the League of Legends universe was moving towards a more consistent canon, with deeper exploration of hextech's origins, particularly through Arcane. This required a complete reimagining of Skarner's role, as well as the role of the brackern, the ancient crystal scorpions of which Skarner is a member.



C5. BlueBeam vs Hextech conclusion

Thus we can confidently deduce that Hextech was being reimagined and reworked for Arcane. In Arcane, the blue Hex Crystals are a key element tied to the plot, used as power sources with immense magical potential. Before Arcane, the visual concept of hextech in League of Legends wasn't as defined or centralised around these blue energy crystals, at least not in such a dramatic way. The series really amplified their importance and made them a recognisable symbol of magic-infused technology. Before Arcane, Hex Crystals were the screaming souls of dead crstal brackern.

So, while hextech itself predates Arcane, the prominence and specific visual of blue energy balls or crystals really gained traction with the series and the lore was completely differnt. Prior to that, hextech was more abstract and less visually specific in terms of these blue energy sources.

Moreover, Hex tech wasn't used in the same manner. Before Arcane, Hex tech was not used for teliportation nor travel. Hexgates as we see them in Arcane were indeed introduced specifically for the series and were not a part of League of Legends lore prior to that. In Arcane, the Hexgates serve as a crucial innovation, enabling instantaneous transportation and revolutionising trade and travel between distant locations, further enhancing Piltover's reputation as the "City of Progress."

Before Arcane, while hextech was a known concept in the broader League of Legends universe, its applications for fast travel or teleportation hadn't been defined, used or visually represented in this way. The Hexgates are a new creation for Arcane, expanding the potential uses of hextech technology in a significant way. This showcases how hextech has

evolve away from the retconned lore, from just being a power source or weaponry to something that reshapes the very infrastructure of the world.

The Plaintiff alleges that it is confirmed by Riot employees many times over, that LOL Hextech has been retconned to bring it align with the Hech tech of Arcane. The Plaintiff alleges that Hextech in Arcane is significantly similar to BlueBeam of Bloodborg. Plaintiff specifically notes the retcons, teliportation and travel links, blue energy balls, and later in the story, the links to eyes, blood energy and blood engineering, which were never fetures of hextech before Arcane. Hextech- and later Shimmer - are set up as a MacGuffin and plot anchor (around 19%). In Bloodborg, The MacGuffins / plot anchors are Fusion, BlueBeam (with Vada in-brain) and Fetal Sapien Serum. The Plaintiff alleges that these concepts are remarkably similar. Additionally, it is alleged that Shimmer is a blood-based biochemical, turned purple to account for cultural sensitivities and censorship in easterned markets.

D. Chase and Pipe Slide Scenes (S1, E1).

Both of these scenes appear in both Bloodborg and Arcane. Children running and escaping down a pipe is not specific, nor detailed enough to establish infringements. However, when they stack up, scene after scene after scene, "Pix N Mixed" in different orders, with specific details observed in both, the case of infringement becomes clearer and more defined.

Until this point, the Plaintiff has shown how all of the story beats, designs, characters, concepts, plots and structure points are astoundingly similar. This has set up the stories. Even if the stories massively diverged from here, the plaintiff states that there is already ample evidence of copyright infringement. Yet the crossovers are alleged to go far deeper.

This brings us to the story structure point called the "Key Event." A key event in a story is a moment when the main character becomes involved in the plot after the inciting incident. It's a pivotal moment that propels the story forward and changes the character or their situation. After the key event, the protagonist or characters have crossed a line of no return. There is no going back. Something or someone has created an event which will propel the story forward and pushed the characters into the main plot. The Key Event comes at around the 12-25% mark. It leads right into the First Plot Point (25%) which marks the end of the first act. After this point, the whole of the main story is set in motion.

It should be noted, this structure is universal, across all mediums of storytelling, yet It doesn't have to be told in a linear way, and some might not follow any structure at all. Yet the overwhelming majority of stories do follow this structure.

C1. POV and Composite Stories Structure

Arcane season 1 is a nine part episodic TV show, told in 3 acts, and like Bloodborg, it interlinks many points of view. This is a little different to the norm, as is Bloodborg. Bloodborg tells 6 main POVs with side story quasi POVs. These storylines interlink and are told from many different locations, building together, winding tighter and tighter together until they are all bound into a climax. Only the first Bloodborg book is written, but Bloodborg: The Harvest can be read as a standalone book with all the plot points and so can each of the POVs. This is relatively the same in Arcane. This is sometimes known as composite stories or nested stories. It's common in TV shows. Yet to have many different storylines running side by side that crossover, and tell the same story, with the same beats and same

characters in two unrelated pieces of work, is like tossing strands of hair out of an aeroplane and expecting them to be braided before they hit the ground, to use an analogy.

C2. Key Events- Boom Boom!

This brings us to the Key Events of these two pieces of work, and the reactions to the key events. The Plaintiff alleges that the ordering of these scenes are different in Bloodborg, yet if you place all of these scenes on post-it notes and rearrange the order, you get the same events told in a different order to fit the narratives and the characters. Every moment of which will be explained.

"The Heist" gone wrong is subversion of "The Heist" Plot Archetype, used as the Key event in Both Arcane and Bloodborg.

Furthermore, the consequence of the heist gone wrong in both pieces of work is and explosion, followed by a chase and the gangs reacting, scrambling to reorganise (Re-org) and figure out the next move.

Arcane's Key Event- Vi and her gang go on a heist, across the rooftops. They break into Jayce's apartment after receiving a tip from "Little Man" who later in the story becomes Ekko. The heist goes wrong, Powder drops a hex ball and blows half of the apartment out- Kaboom! This explosion is the catalyst (Key Event) which forces The Enforcers to hunt down Rook and her gang, also making them a target for Silco and his Goons after they bump into Deckard in an alley and he sniches on them.

Overview, Bloodborg, Rook's POV Key Event- Because of the "show don't tell" device and the nature of good storytelling, you have to do a little more work to figure out what went wrong in Rook's "heist". Rook runs around the roofs and cables of the high towers, blowing up the signal jammers for White-eyed Morgan, known as Sky-Pirate Morgan. Morgan is a mysterious and shadowy leadership figure, leading a resistance from deep down within New Kowloon. Morgan runs Yonder-Sky-Pirate Radio Station, broadcasting live from a hidden place. He informs everyone about the plans of the Feral Fighters and The Assemblage. Morgan organises food, alcohol and supplies drops, coded as "The Last Drop" (which just happens to be the name of the Zaun based pub/ club which the children live under in Arcane).

The people who help Morgan are sent coded delivery drop points in messages. In return resistant members and supporters help keep the airways open and feed Morgan with information or they help with other missions. Rook, being an amazing parkour runner and climber, helps by blowing up the signal Jammers- Kaboom! This helps feed her and her adoptive family and the Gangway Children. After blowing up some jammers, Rook flees and is nearly caught. She is forced to make a big, and very risky jump. She hits her face landing the jump. This explosion and near miss, in which some of the Feral Fighters didn't survive, is the catalyst (Key Event) which forces Cowboy Momahan to hunt down Rook and her gang. After Rook's adoptive brother bumped into Dodge in an alley, and he gives them information, it is implied that he snitched on them (But he was innocent).

Extracts from Bloodborg-

'I hit my face as I landed the big jump, the one between the sky-rail control tower and the central cable mast,' yelled Rook, rubbing the swollen cheek, hidden under the tightly wrapped maroon veil."

Later

"'I've intercepted Feral Fighters with poor radio discipline. Their talking about a runner boy who they couldn't catch today. These fools couldn't catch their reflections in the mirror, never mind catching our Rook,' said Macaulay unplugging his headset for all to hear."

Later

"'He's too quick Boss, you need to see him move before you blame us. We couldn't catch him. We couldn't even shoot the little bastard, he isn't from around here, nobody in the Needle District moves so quick. He climbs like a fucking cockroach, runs like the wind and jumps like he has no fear of falling. He runs in zigzags and hops over ledges with his hands, like a bastard monkey. The little bastard monkey boy. If I get him boss, I swear it, I'll-"

Later

"In other news, the Feral Fighters have been working overtime to block my broadcasts, destroying my speakers and signal masts to silence me. I urge my fellow New Kowloonians to take to the skies to find the jammers and destroy them by any means."

Later

"Mac could you plan me a route to Lugar dal luz popping off three or four of the jammers on the way."

Later

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"Rook set and detonated explosives to sever the four main stability cables. The dome dropped and popped like an air bubble. The shattering glass rained down on the Ferals, mincing them to piles of raw hairy flesh. The jammer was crushed to scrap metal."

Later

"'I bumped into Dodge near Tec Alley, he said he'd been locating them for an old black guy with white eyes, he gave me the info chip."

From the Synopsisof Bloodborg- "The Feral Fighters and the Assemblage are trying to take down Morgan and trying to stop him from broadcasting, so they place jammers around New Kowloon. Rook runs around the city disguised as a boy, destroying the jammers"

Key Event Conclusion

The Key events of these stories are both heists gone wrong, a subversion of "The Heist" Plot Archetype. Both mistakes are from explosions, both events drag the antagonist into the plots, and both mark the gangs as targets for criminal "Kingpins" and their fighters. Both gangs are thought to have been "Stitched on." In Arane Hextech is lined up as the plot device, or MacGuffin (around 19%).

C3. The Chase.

After the Explosion Vi and her gang are chased. This is one of the many points where it is alleged a major patchwork of "Pick N Mix" is used, taken from different parts of Bloodborg. For The Chase the plaintiff will present images from Arcane. Under each image the Plaintiff will match the segments which are alleged to have been post-it notes or pinned up in writing rooms.

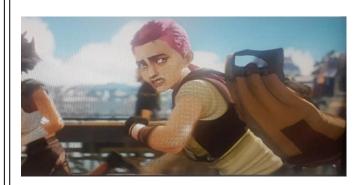




BB- "The gangway snapped off dropping past Rook. The flanking pillar collapsed,"



BB- "They turned back to see a grey dust cloud shoot up into the air."





BB- "The solarscape protection force ran towards Rook with electric stun batons at the ready. With returning vision Rook Jumped up. Dodging and weaving, Rook danced around the protection force officers until the street hatch blew up into the air and three Feral Fighters ran into the street opening fire into the crowd. Everyone dropped to the deck, including the Protection Officers. Rook ran fast- past the fake tanning shops and plastic surgeons' shop

fronts..."







BB- "Rook cleared a big jump which two of the three fighters fell, one clear missing it and the other smashing his face into the rusty metal rail..."





BB- "Pinged off the pipe by Rook's head, spraying steam into her lenses."

C4. Pipe Slide Scene

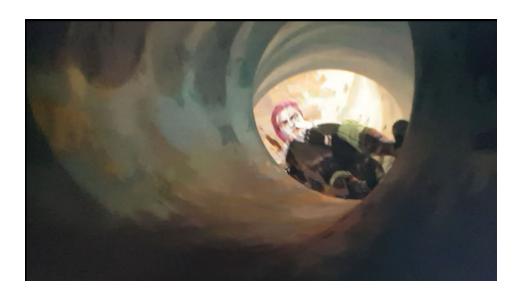






BB- ""Follow me,' she said, running through the street platforms. Soon they came to an opening in a large pile of rusting metal. Rachal push down on a foot pad, releasing a metal hatch. Rachal moved a sheet of corroded metal aside and hopped into the pipe.

'It's a long way down Rook, and it's fast, but it's safe, follow right after me,' said Rachal, placing her hands on the top of the pipe. 'See you on the flipside,' she said, disappearing into the pipe.



"Rook hopped into the pipe. She Looked back up towards the north of the district.

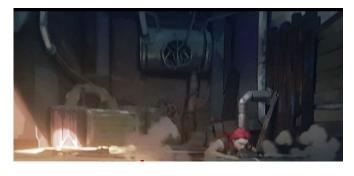
Smoke still rose from her home. She whimpered."

Rook whizzed through the pipe, descending into the smog, holding gulps of air in her cheeks. The old metal pipe curled, then fell..."



BB- "They built the raised streets, closing off our sunlight, they drop their rubbish

on us..."





BB- "Rook found a service hatch and emerged silently, topside of the smog rotators. The under lanes of metal planks, service tubes, cables and columns..."

Chase & Pipe Slide Conclusion- These happenings end the Key Event. In terms of progression (Word count or place in the whole storyline), we are now 25% (a quarter) into the structural framework which sets up the whole of Arcane. This gets us to the First Plot Point which marks the end of the first of 3 acts. Thus, in terms of plot structure we are almost 1/3 into the 3-act structure. We've matched all of the major structure points showing in a deep dive, how they are astonishingly similar.

D. First Plot Point- Snitches, Lanes, Traitors, Traders and Hound.

Arcane- The first plot point in Arcane comes from the reactions to the hex crystal explosion and heist. From this explosion and the aftermath Silco finds out that Vander's children are in trouble. Silco subsequently sees this as an opportunity to trial his new biochemical drug, Shimmer, to move on Vander and his children, with the help of a topside Enforcer "Marcus".

The FFP is the Enforcers hunting Vi and her gang, making them a target for Silco and his Goons after they bump into Deckard in an alley and he sniches on them.

Although we haven't met the characters yet, this hex explosion also brings Jayce and Viktor into the central story plot. In Arcane, We see a few last subplot and main plot setups before the First Plot Point is set in motion.

Bloodborg, Rook's POV- We see a similar first plot point shaping up in Rook's POV. This is shown via an intercepted radio transmission of Cowboy Momahan planning to move on Rook and her gang.

It should be noted that Cowboy Momahan speaks in a new world mongrel deep south dialect.

BB-"'y'all bring that monkey climbing piggy fuck to me, is what you gonna do.

Aah wanna know who this yellah belly dog fucker working for, and why he ain't working for me.

Aah'm the diddy of this here District. This sinking city gonna be mahn someday. Just as soon as those Assemblage main fellah git me mah re-e-tiremen-ter fund and Lem-me back on the mainland, amen. They sayd it won't take long they sayd. The sayd I can take mah boys along for

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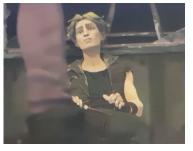
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the ride. Y'all coming with me, if y'all lac. Just so long as you catch me that dawg, be-fo-wal it's too late, be-fo-wal that Lickety split boy cause us here some more damage. Aah'm taard of that boy running rings around mah boys and make-in us 'all look lac fools. He aint nothin special, aah'm gonna teach that boy a lesson. Get me that boy."

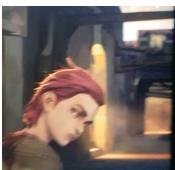
In both works, the reaction is of a kingpin/gang leader declaring that he has an unofficial plan to make a move on the children. Yet before we reach this point in Arcane, we have more set-ups and exposition to cover.

D1. Snitches

Vi and her gang bump into Deckard and his mates in an alley, they have a fight, and Deckard sniches on them to Silco.







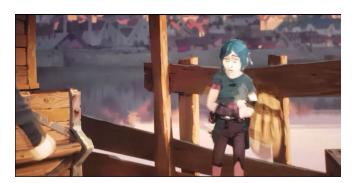
In Bloodborg- Discussions of a planned fight take place against the person who they believe is snitching, but they are wrong.

BB- "'I bumped into Dodge near Tec Alley,"

BB- "'I think I may pay a little visit to our friend Dodge when he's least expecting it, something sounds offish here.""

D2. Ditching the links to the explosion/incident.

In Arcane, Powder chucks the loop bag over the rail, and it sinks down into the dark abyss.







BB- "If I were you Mac, I'd have chucked that info chip straight over the rails and into the abyss."

D3. Vi Post Fight

Post fight, we see Vi and her gang take an elevator down to the lanes, which are in the underworld of Zaun. Vi has a maroon hood and swollen cheek. Later in the series Vi also has a prominent upper lip scar. Vi from Riot Games' League of Legends did not originally have a scar on her upper lip prior to the release of Arcane. The scar across her lip was introduced specifically as part of her character design for the Arcane. The scar adds more depth to her character, emphasizing the harsh, violent life she led growing up in Zaun.





From Bloodborg,

"Yelled Rook, rubbing the swollen cheek, hidden under the tightly wrapped maroon veil."

Later

"Rook unwrapped the maroon head vail, revealing prominent cheekbones and raspberry lips."

Later

"Rook pulled down her maroon vail and gazed at her reflection in the blade."

Late

"Purple bruising followed the ridge of her teary cheeks. Her perky under lip was torn."

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

D4. The Lanes

"The Lanes" to describe the streets of Zaun in Arcane was not widely used or explicitly established in the League of Legends lore prior to the series. In the pre-Arcane lore, Zaun was typically referred to as a polluted, industrial city which started far apart from Piltover on the map but grew closer and became its sister city. Now Zaun is below Piltover, full of chaos and poverty. The Plaintiff will file a separate document detailing the development of Piltover and Zaun.

In League of Legends (LoL), "lanes" refer to the three primary paths that run across the map on the game's main mode, Summoner's Rift.



In Bloodborg:

"The under lanes of metal planks, service tubes, cables and columns, were pitch dark"

Later

"Warwick placed his hand on the small of Jade's back, guiding her into the lanes of the wonky erections."

Later

"Barefooted children ran through the elevated lanes, chasing after rats with fishing nets on sticks."

Later

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

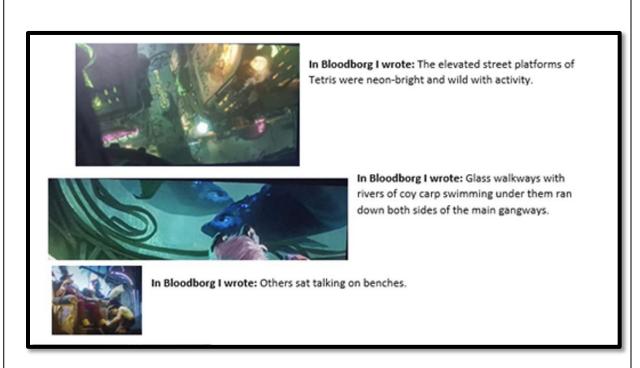
D5. More specific details of the Lanes in Both Arcane and Bloodborg.







BB- "Sweat greased Rook's spine as she entered the illuminated platforms of Midcity. Citypop music rang out of floating speakers. Rook pulled her hood cords tighter..."







BB- "Trance music fussed the air. The scent of sugar, dough and coffee lingered, invitingly."

BB- "Skinned dogs, cats and rats, hung from hooks on the trading stalls, running down the lanes."









BB- "Doorman ushered people into their clubs. Prostitutes of every creed and gender, every shade and size, touted for business."

BB- "As a Jack pod read the retina of a large-breasted man,"





The Last Drop, the name of the bar in Arcane, is alleged to have been taken from a codename for supply drop points around New Kowloon Bloodborg.

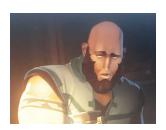
BB- "Happy eating, natural corn, sugar, rice from the mainland, one scoop of each, make it last, this may be the last drop"

D6. Traitors, Traders- Undercutting the local

The Traders - Jules sits beside Vern as he conducts a business transaction with Huck (Local), who is upset about not being paid the ten thousand they agreed upon. After Huck's snit tossing the bag of money toward them, Jules pulls out her knife, plunges it into the table, and asks that Huck make a choice. They're then joined by Vander, who, despite Vern asking him to leave, pulls himself a chair and advises Jules to be careful with her words as the bar patrons glare at her. Vern then calls Vander by his name and Jules by his title, "Hound of the Underworld". She follows up by saying that she expected someone younger, but Vander claims he'd expect

them to respect their deals. This leads to Vander politely asking them to follow up with the deal they made with Huck, and they tacitly agree.

In the original scripts these traders played a lager role, working with Silco and they took Jinx to Bilgewater to become a pirate.

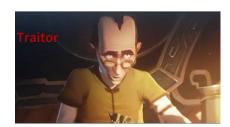




In Bloodborg, it is alleged that these traders are known as the Monroe Hunters.

BB- "Then you can give me a fair cut of the money you made off the back of me taking out the Monroe Hunters'"

The Traitor- Huck



Arcane- Huck is a traitor in Arcane. In Act 2, Huck betrays Vi to Silco in exchange for shimmer.

Bloodborg- It is alleged that Huck is taken from Marvin The Machine, who betrays Warwick

BB- "'You sold me out to the Monroe Hunters."

'I didn't, I wouldn't.'

'Marvin, they hired you to hire me..."

D7. Hound.



Arcane- In the last drop we see Warwick / Vander standoff with traders, who acknowledged his status and backdown, he shows he is a reasonable man by sharing his pipe. The act of sharing is a de-arming bond, like a handshake.

Bloodborg – "The leader looked back at the boat, moving to the corner of the platform. Warwick tossed a pack of cigarettes over his shoulder. John caught them."

This act of sharing is also a de-arming bond, like a handshake.

E. Aging Mentor- Vander / Warwick

In time, The Plaintiff will file a character comparison of Vander and Warwick from Bloodborg, with links to other characters, such as Vi's season 2 coping mechanism. For this analysis, The Plaintiff will focus on Vander in episode 1. However, it should be noted that Vander is alleged to have been modeled directly from Warick in Bloodborg. Compellingly, at the end of season one of Arcane, Vander is mutated into a werewolf from the LOL games, called

Warwick. Then in season 2, the werewolf Warwick is transmuted into a werewolf Bloodborg with a gold head.

E1. Fading Reputation





Arcane- Vander, known as the hound of the undergrown is a notorious local hearo and ex-fighter, turned father figure of the street children (Vi's gang). He is stocky and aging with greying hair. He runs the pub and makes many under the counter deals and trades. Later we see Vi arguing with Vander because he doesn't want to fight back anymore. He wants peace.

In the Last Drop, Jules says to Vander. "I expected something younger."

In Bloodborg – 'You have been pissed up in your high tower for so long, you don't even matter in New Kowloon anymore, your name has faded, nobody fears you. You're a broken man, like that stupid broken sword you carry around. You're a fable in the kid's stories now. The man that used to fight back against the Raiders and Hunters, the man the Hunters

feared. That's all in the past, you have lost it, your ageing, look even your fucking hairline is fading away. There's more grey on your head than there is in that bloody smog outside.'

Later - 'Look at all this grey hair. How old are you Warwick.'

Before - 'Warwick's stocky shoulders...'

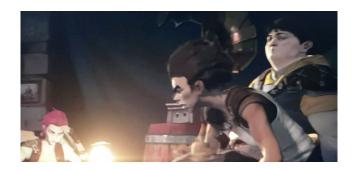
Later- 'The kids, the children see you was a saviour, because you fight against the Mercenaries and Raiders to save them'

Later- 'It's in the kiddie books, the street kids living in the shantytown below your apartment building drew pictures of you, standing up in the windowless apartment.'

E2. Arguing about ability.

In Arcane, S1, E1, the roof heist scene, Mylo tells Powder she is too slow and can't keep up. Then when the children get home, Mylo keeps blaming Powder and criticizing her for being less able.





Bloodborg-

"No chance, Matteo you wouldn't make it to Midcity never mind lower city."

'What's that supposed to mean-

'Rook's right Matt, you just aren't in the best of shape right now. I should come with you though Rook.'

'You wouldn't keep up either Mac."

E3. Tip from Little Man.



BB- "I scanned the chip before I brought it back here and I visited Trax to get the latest update on the firewalls before I plugged in, said Mac,"

E4. Everyone Out.

When Vander confronts the children, Vi snaps back, "When did you get so comfortable living in someone else's shadow.

Vander says, "Everyone out." Dismissing the other children.



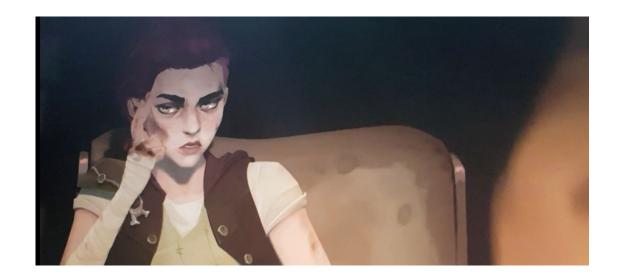
BB- "No,' snapped Rook in a deep grumble.

'I think we have learnt enough about the trade today children,' called Mateo, struggling to his feet. 'Let's pack it up and I'll see you for deliveries in the morning, quick as you go, come on now,' He added, ushering the children out..."

E5. Those kids look up to you.

Zander sits opposite Vi and begins to tend her wounds. Vander says, "those kids look up to you."

Vi says, "Yeah I know." Then she glares at the ground with an annoyed, worried and disapproving look on her face.



In Bloodborg, "They look up to you, you know,' said Macaulay tossing Rook a bottle of water.

Rook says, "'I know, I don't like it,"

E6. Pulling cork with teeth.





BB- "said Warwick, pulling the whiskey bottle cork out with his teeth and filling his empty tea mug with whiskey."

BB- "Warwick pulled the cork out of the bottle with his teeth and spat it at Roy."

E7- Inspecting wounds and tending to bruises.

Vander / Warwick inpects and tends to Vi's bruising. Vander says, "How did you get this?"

Vi says, "Some idiot was following us."



BB- "Who did that to you?' said Warwick, holding Jade's chin, running his finger over her bruises."

 $\textbf{\textit{BB-}} \ ``Quick, someone turn on the interceptor to see if they followed Rook, ```$

F. Trading shop.

In Arcane, after the conversation with Vi, Vander goes to Benzo's Trading shop, he takes goods to trade in, but really, he is going to get information about the aftermath of the explosion, and to find out who is after the children, and who followed them. Through the interactions between Benzo and Vander, we find out that they have been good friends for a long time.





Bloodborg-"'Arr Mr Warwick long time many see you, 'said Wu Zhang.'

'Hello Mr Zhang, how are you today,' said Warwick. The pair had been friends for a long time. Warwick had stopped a gang of youths from mugging Mr Zhang's wife, many years ago. They had been close friends since, plus Warwick was good for business and Mr Zhang was a very clever man, he built and help fix many of Warwick's equipments and gadgets. Mr Zhang was a relic of the district, very few people had been here before the fall, both Mr Zhang and his wife had been..."

G. Searching for culprits and others.

This is where we are introduced to the enforcers. Marcus (who has made a deal with Silco) and Grayson (who has a deal with Vander to keep the peace.)



BB- "Today's movement reports suggest that a force of one hundred to two hundred Feral Fighters are marching south towards the Midcity lights, they are looking for someone close to me, they will be searching the clubs in that district, stay out of their way, they will kill as they please."

BB- "The Assemblage has, supposedly placed out this warrant on Jade and Morgen, but no one knows what either Jade or Morgan look like."

In Arcane, Vander / Warwick is working with Grayson to broker peace.

G1. Working with the Enemy





In Bloodborg – "'You're working for the Inner Assemblage. You must be to have equipment and technology like that.'

'No, I'm not Marvin, but I do know you have taken bribes from them, I've known for a long time, I've let you get...'"

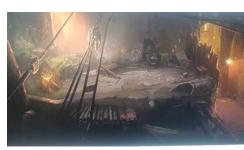
H. Looking out over the city's skyline

In this example the Plaintiff alleges that Arcane's world building and storytelling of repeated reflective and intimate moments looking out over the city, is a narrative device from Bloodborg. This ties into the story circles of the Bloodborg: The Harvest manuscript, which shows mirroring and duality, the characters face the same conflict, from different viewpoints and perspectives and different stories. This world-building scene, as repetitive story device is used to set the mood and tone during lull moments of exposition and character development. This is a

trope, yet it is a trope used in a mirroring and cyclical way in both works and it marks the progress in both stories and it's used in remarkably similar ways.

H1. Vi making light of the dire environment.





In this scene, to soften the mood and add a level of residency, showing that Vi has experienced much in the area, Vi points out places of funny events and memories, such as a man taking a leak, a painted middle finger and her favorite stuffed bunny stuck up in the wires.

In Bloodborg, Warwick's POV, we see a remarkably similar event and discussion between Jade and Warwick.

"'Where is the Mouth district,' ask Jade.

'Look said Warwick, pointing to the oval connection of buildings with studded rooftops. That's the mouth and they are the teeth,' he said.

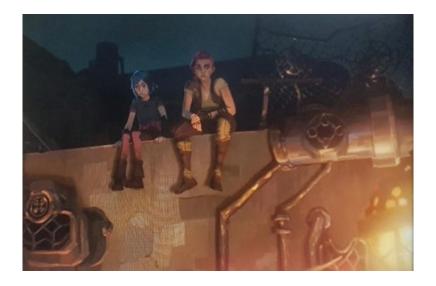
'How old are you, that's something a child would name it.'

'A lot older than you my dear. Besides, maturity has little to do with taking pleasure in giving districts funny names based on their appearances.'

'I guess not, that's mostly down to lonely drunken times, looking out over the city, isn't it?'"

H2. Vi sits next to the handrail (broken safety features), looking over the city with Powder.

Sitting next to a former safety feature (Handrail), which is now battered and broken, is a specific aesthetic used to convey a sense of disorder and chaos and danger in the environment. Just the presence of the safety feature, against the contrasting environment adds to the intrigue and sense of danger.



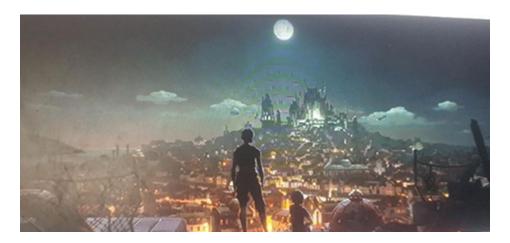
In Bloodborg, Rook's POV- "Looking over the platform rail, Rook gazed down at the red and orange fires littering the gangways. Screams and cries echoed through the warren of the spiky buildings. Rook sighed and sat down against the platform handrail."

us. "

H3. The city's buildings and districts.

In Arcane, during this image Vi says, "And one day, this city is gonna respect

The city does not match the topography of the history of Piltover and Zaun before Arcane. What we see is Zaun, above ground, and Piltover in the distance. We see a devouring drop below Vi and Powder. Then we see bright orange lights or fires with flat buildings in the mid-ground. Then elevated spiky buildings in the far ground.



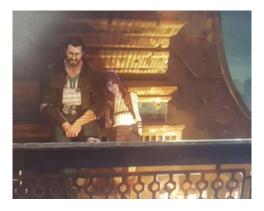
From Bloodborg- "Warwick stood at the open edge of his dilapidated penthouse apartment looking down over New Kowloon. The square of skyscrapers below him were an uneven set of blunt teeth, in desperate need of a visit to the dentist. He called this area The Mouth. Inside The Mouth a fire was spreading. He gazed into the flames, glad to be far away from the heat; Summer evenings like this were already unbearably hot and humid. The flames bounced off the fire-resistant steel creating small fireballs. The fire wouldn't last long, they never do. The buildings are designed to smother and contain the fires, self-preserving steel, they call it, it's a wonderful invention, it is part of the reason the city still stands.

He looked past the buildings of The Mouth, to the district he calls Tetris, after a handheld videogame which he found in an old museum on one of the lower platforms. The district is more commonly known as Solarscape or Midcity. The Solarscape district has power, thus the buildings are brightly lit, like the blocks in his videogame.

Amongst the studded buildings in the far ground, an area of needles pricked the heavens. Needles is a smaller area, only six blocks wide by six blocks long. Needles is one of the most avoided areas of New Kowloon because a feared gang of lawless wreckers..."

H4. Beyond Episode 1.

This document is primarily an analysis of episode 1 of Arcane. However, it should be noted that this trope, used as an aesthetic storytelling device, and a moment of introspection, mirrored in different POV's, is a distinct feature of both works. This design continues throughout Arcane. Below is an example of Vander talking to Vi, just like Vi talked to Powder. Vi has her head resting on Vander for reassurance and care.



Bloodborg, Warwick's POV- "Jade turned her head, resting her chin on his shoulder.... she sat right next to Warwick and dangled her legs over the edge of the building."

H5. More Examples of "Over the City"

From Bloodborg-

1. Jade made the coffee and sat down next to Warwick at the window edge, looking out over the city.

- 2. 'We are the Yonder-Sky-Pirates, the Pirate radio station that broadcasts out over the city every day. Morgen is our leader, you might have heard of him, Old one-eyed Morgan.'
 - 3. 'Should we get back to my interrogation,' said Jade, looking out over the city.
- 4. 'I guess not, that's mostly down to lonely drunken times, looking out over the city, isn't it?'
 - 5. Looking out over the city, I can see a road sign for Dunkirk
- 6. She looked out over the city, the skyscraper she had climbed was largely cut off from the labyrinth of connecting walkways and giant cables.
- 7. She gazed over the city again. She pushed a button on an infinity symbol like device embedded into her forearm.
- 8. The storm raging over the city continued its northern advance, she followed the storm north.

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H6. Conclusion

The "looking out over the city" trope is often used in films, books, and other forms of media to convey various emotions or themes. It can symbolize a character's introspection, longing, or feeling of isolation in a vast urban landscape. Sometimes it represents ambition, as if the character is contemplating their place in the world or what lies ahead for them. Other times, it's a moment of peace or melancholy, providing a quiet break from the chaos of city life. This visual tends to work well because cities, with their lights, buildings, and activity, offer a striking contrast to the stillness of the observer, creating a powerful metaphor for personal reflection against the backdrop of a busy, indifferent world.

However, The Plaintiff alleges that, whilst the trope is common, the way it has been implemented is not. The use of the trope for mirroring POV's and conveying a sense of connectedness and repetition, adds to the cyclical storytelling and this is achieved in a unique way in Bloodborg, which is extremely similar in Arcane.

Moreover, the specific details of using humor in landmarks to make light of the dire environment, sitting next to the handrail to show safety features in a dangerous environment, head resting on a protective older male to add to a sense of vulnerability and bonding, are all examples of specific and nuanced storytelling, which are unusually similar for two pieces of work, which Riot alleges are not connected (Infringed upon).

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I. Villains - Introduction to Silco and his Goons.

In both works, the antagonists are not always so clear. In this part, the plaintiff will be using Silco as the antagonist as this is how he is portrayed in this scene near the end of episode 1 of Arcane. The Plaintiff will file a more detailed comparison of Silco Vs Cowboy Momahan of Bloodborg.

I1. Morally Gray

In both Bloodborg and Arcane there is a lot of moral ambiguity, a lot of morally gray areas, people and motivations, in most characters. In both works we see many characters switching roles or becoming the "Monsters". This is yet another strikingly similar important storytelling element of these works. This is contrary to the LOL cardboard versions of most of these characters.

The theme of morally grey characters is deeply woven into Arcane and is one of the show's most compelling aspects. Characters in Arcane are not easily categorized into "good" or "evil", and their actions are driven by complex motivations, often blurring the lines between hero and villain. Many times, the roles or archetypes are switched or subverted in Arcane, to varying success. This is the same in Bloodborg. Moreover, subversion is a hallmark of the M.W. Wolf catalogue of fiction.

Silco is a prime example of a morally grey character. On the surface, he's introduced as the primary antagonist, the leader of the criminal underworld of Zaun, seemingly driven by a desire for power and control. However, his motivations are rooted in a deep resentment of Piltover's oppression and his desire for Zaun's independence. His love for Jinx is 2 3 4

genuine, and his paternal bond with her humanizes him, making his character far more complex than a simple villainous archetype. While his methods are brutal and manipulative, they stem from a sense of duty to his people and a warped form of care for Jinx. Later in the Arcane series, we see Silco's backstory. He was once a good man, a bro-mancing best friend / lover of Vander's.

Bloodborg- It is alleged that Silco and his moral grayness, or his journey to being a villainous character, are strikingly similar to that of Cowboy Momahan's in Bloodborg. In Bloodborg, this is implicitly implied through discussions of Cowboys' dialect, his Past on the mainland and him becoming banished to New Kowloon. Cowboy Momahan's backstory from Rook's POV, mirrors that of The High Commander's backstory in Josh's POV. Both backstories are left in tantalizing mysterious ways. Both of these characters have been alive for an extremely long time (hundreds of years), yet this is an unrevealed secret in Bloodborg: The Harvest, the first book of the trilogy, which ties into the wider M.W. Wolf Megaverse of Fiction.

Cowboy Momahan was once good. He had a family and a ranch on the mainland (Deep South U.S.A). He was a war veteran who got hooked on adulterated blood drugs which he used as a vice to mask his suffering (PTSD). He was in a high-ranking position of power and influence. Years of life and trauma, mixed with drug use, drove him insane. He began working against the mainland, selling blood drugs. He was banished to New Kowloon but still works with the Assemblage, hoping to get back into a position of power, and trying to become the King of New Kowloon (The Underworld).

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BB- "He was born on the Assemblage. He was a commander in the Assemblage Defence until he was banished to New Kowloon for smuggling rare blood into the Assemblage and selling it to restricted people."

The High Commander shares a mirror story with Cowboy Momahan. He has also sustained his life far past normal life expectancy via a military trial blood drug. It is hinted that he was at Rorke's drift (22nd January 1879). Yet it's also hinted that he is originally from Spain. He has lived in many shoes. He is now commanding "The Wall", also known as "The Stand." He is also perceived as "Crazy" and perhaps "delirious," yet he is a brilliant commander. He is addicted to war, stuck in a perpetual state of adrenaline and drug fueled fight or flight (PTSD). He is also addicted to blood-based drugs.

BB- "The High Commander keeps shouting something about Rorke's drift."

BB- "the High Commander made up in his head, he often speaks in tongues unknown to me, or to anyone that I've spoken to on the south wall for that matter.

People say the High Commander has taken The Stand for too long, and he fraternises with the Nullifidian."

I2. Henchman - Gustove "The Scowler" Jowler

Gustove "The Scowler" Jowler is a thug working for Silco. We see him in Silco's lair in episode one. He kicks Deckard's chair back and stands menacingly over him. Gustav is a tall, bald, intimidating figure, distinguished by his signature permanent scowl, which gives him his nickname. He works closely with Silco, enforcing his rule over Zaun's criminal underworld. Gustav is loyal to Silco and helps carry out his plans, often appearing in scenes involving intimidation or enforcing Silco's will on Zaun's streets.

Gustove gained his signature permanent scowl due to a severe injury to his face.

While the show doesn't go into full detail about how it specifically happened, it's implied that the disfigurement likely came from his dangerous life in the criminal underworld of Zaun, potentially in a violent altercation, battle or perhaps burn like Singed's disfigurement.





In Bloodborg- it is alleged that this henchman/ thug of Silco's is remarkably similar to Raven Duke of Bloodborg, who is described as a Naked mole rat with burnt scarring on his mouth leaving him with a permanent smirk. The major difference is, Arcane creators turned the smirk into a scowl.

BB- "Warwick recognised him, how could he ever forget a face like this, the Fighter, One of Cowboy Momahan's generals, looked like a chunky naked mole-rat. His name was Raven Duke, well at least that is what he liked to be called by his men. Warwick thought it to be a childish name, one you might find in one of those Old-World comic books. Raven Duke was badly burnt during a turf war with a rival gang, leaving his face a raw pink. His mouth was scarred into a permanent smirk, revealing his chisel teeth and leaving a constant drool down his chin."

I3. Multiple Use- "Chross" and others.



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It is alleged that, to save money, time and creative thoughts, the creators of Arcane used the same designs and archetypes over and over. This can be shown in multiple character designs with Riot Games IP. Moreover, Arcane "Writer" Christian Linke has spoken several times about cutting corners, saving time as animation and design is expensive, and "Not reinventing the wheel."

Thus, it is alleged that, along with Gustove "The Scowler" Jowler, The Chem-Baron named "Chross", has taken the same design features and descriptions (Naked mole rat), and changed things up a little to mask him.

On arcane.fandom.com, which might also be part of the fandom page Riot purchase to control, states, ""Chross" was once a citizen of Piltover who moved to Zaun when he realized that his skill set, and personality worked well in the undercity. Chross made a name for himself as the ruthless and clever leader of a highly organized and dangerous gang. Soon, he became affiliated with other crime lords,[1] forming the group of chem-barons that control the undercity, led by Silco.[2] Because of Silco's connections in Piltover, officers have been unable to track him down nor pin most crimes on him."

https://arcane.fandom.com/wiki/Chross

On this page, Chross's design appearance is described as "Chross is a pale and wrinkly old man with white eyebrows. He is bald with large ears, chin, and forehead all sagging due to age. He has age spots over his face and a small tattoo on his forehead."

14. Naked Mole Rats- Swipe and Gripe, Gripe, Gripe.

This is a Naked Mole Rat, matched next to the Arcane characters who are alleged to have been copied or tailored from Raven Duke of Bloodborg.













PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

The plaintiff has provided three examples of suspected re-use. The first, Gustove "The Scowler" Jowler, is the most clear-cut, as his likeness of a menacing bald chunky thug (Henchman), goes beyond descriptors, with his backstory of mouth scarring being astoundingly similar to that of Raven Duke's in Bloodborg.

The second, Chross is the closest match to an actual naked Mole Rat in terms of appearance.

The third is "Smeech", a rat with chisel teeth. Smeech is introduced in Season 2 of Arcane, which was still being "Figured out" after the release of season 1 and even during the filming of Bridging the Rift. It is alleged that the same work (Bloodborg) has been consulted over and over to build almost every part of Arcane.

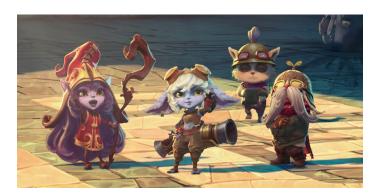
I5. Smeech

It is alleged that this is the "Pix n Mix" method, with the Bloodborg segment:

"Naken Mole Rat... His mouth was scarred into a permanent smirk, revealing
his chisel teeth and leaving a constant drool down his chin." Being picked several times to
build Arcane and as character fillers. It is alleged that Smeech is also taken from this post-it or
pinned up note.







Yordles are a unique and iconic race in the League of Legends universe, known for their small stature, magical affinity, and diverse personalities. Yordles are a whimsical race of furry beings from Bandle City, each with its own distinct personality and magical affinity. They're often mischievous or quirky, like Teemo with his cheeky traps or Lulu with her playful reality-warping spells.

Yordles fit The Comic Relief' sidekick archetype, these funny or friendly, whimsical and magical, and sometimes clumsy characters or races often provide humor and lightheartedness to balance the more serious tone of the main characters. Some examples of this type of character design are Yoda or Wookies in Star Wars, Orko from He-Man, Donkey from the Shrek series and so on.

Of course, this character trope can be subverted and played around with. Yet it begs the question, why is Smeech a bad rat, matching the Bloodborg extract, and not a bad Yordle? Indeed, it is alleged that Smeech is much further from a Yordle than he is from an actual humanoid naked mole rat.

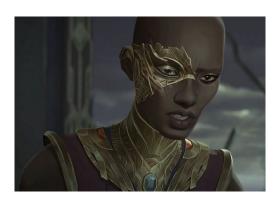
Examples of character designs or model reuse outside of the mole rat.

Arcane reuses certain character design elements across multiple characters or groups, which is common in animation for stylistic cohesion and resource efficiency. We see this in groups, such as The Firelights' members who are masked, Shimmer Mutants, Zaun's Citizens, Enforcers, and others.

More specific and noticeable reuse or repurpose examples include Loris. Loris is a Piltover enforcer who shares a notable physical resemblance to Vander, characterized by a similar build and facial features.



Another repurpose is Councillor Shoola (Bald African woman) matched with Deckard's friend and Silco's goon.





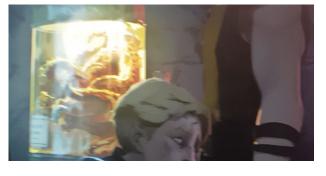


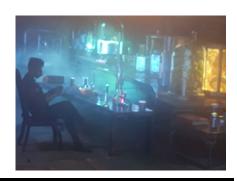
I6. Silco's Lair.

In Arcane, Silco's subterranean lair is hidden under a crab market which the Plaintiff believes appears suspiciously like a converted train station. However, in episode one we do not see the "Crab Market" above the lair. We see marine life outside of the aquarium like window. We see marine life, many squids, in tanks lining the lair's walls.















PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

In Bloodborg, Wu Zhang was a professor of cybernetics and future technology, and his wife Ling was a Marine Biologist. In the back of Wu's shop, they had tanks of squids lining the walls, because they were developing biotech from marine life and many other forms of life.

BB- "What is this,' asked Jade, looking at the robot parts, drone parts and all kinds of weird and wonderful gadgets. A tank of squids lined the entire back wall. A smaller tank containing a scarlet octopus sat next to the door. The Scarlet Octopus hoisted itself to the top of the tank and dropped out onto an armchair. It plopped onto the floor and used its tentacles to drag itself across the white tiles."

BB- "Marine creatures tugged at the bodies before a larger creature dragged the woman's body down into the abyss, leaving behind a rippling wave which shook the small boat."

BB- "The smog was dense, trapped between the raised platform streets far above

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underworld."

BB- "Creatures thrashed about beneath the water, pulling mutants down."
BB- "who knows what Old-World creatures lurked down in that flooded

and the black water below. Creatures slithered around in the seawater."

BB- "Weeds and strange yellow spiky finger-like marine flora, climbed the walls of the stairwell, squeezing into the cracked plaster, and pulling at the brickwork, as if Mother Gaia was dragging the building down into the water- her stomach acid."

BB-

In Bloodborg, the sea creatures and the experiments with them are an integral part of the story and plot. The branching-like root system of spiky finger-like marine flora, climbing the walls is also an integral part of the story and plot. The Scarlet Octopus, the squid, the tanks, and the mysterious sea creatures are all in the story of reasons.

In Arcane, none of these things add any depth or purpose to the story or plot. The branching weeds we see climbing out of Silco's lair are never explained. In Arcane, they grow from Shimmer, further suggesting it is a bio-engineered drug, perhaps still alive in that respect. However, we later learn, in episode 3, that these tentacle-like roots or weeds are flammable. Singed's facial scars are implied to result from these chemical burns, so perhaps they were added just to ignite a fire to rework Singed's backstory to fit Arcane. In the LOL lore, The scar was inflicted by Warwick, and Singed wears bandages to hide it.

Singed is working on these creatures, so maybe Arcane, which was cut short, did have a storyline for these features, perhaps that too might have been remarkably similar to Bloodborg's use of these features.

The Plaintiff alleges that it would be an astonishingly strange coincidence for these features to have been chosen just for aesthetics and yet they match those found in a makeshift marine lab in Bloodborg.

17. Silco's Shimmer Eye Injection







In Arcane, Silco got his eye wound during a violent confrontation with his former friend, Vander, where Vander attempted to drown him in a polluted river, leaving an open gash on his left eye that became infected due to the toxins in the water, permanently disfiguring it; he is later seen injecting Shimmer into his eye to manage the ongoing damage from the toxins.

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In Arcane, the bridge sequence occurs during the prologue when Powder (Jinx) and Vi are children, with Vander acting as their guardian. The time gap between this prologue and the first act of the series is approximately 8 to 10 years. Thus, it is likely that Silco has been using Shimmer for a number of years, perhaps a decade. The Silco we see in the first act is much more volatile, aggressive and unhinged than that of the long hair, feminine energy younger Silco. In Act one, it is likely that Silco is suffering with narcissism and paranoia, suggesting, like both Cowboy Momahan and the High Commander in Bloodborg, Silco is suffering from the long-term side effects of his blood drug, Shimmer.





In Bloodborg, Silco's alleged counterpart, Cowboy Momahan also has to take blood based regulating drugs to keep him alive. He takes different neurotransmitters as his brain has stopped developing them due to long term use of the blood based engineered drug. Cowboy ingests his drug orally though a digital cigar. Interesting sidenote, since writing this, vapes have gained popularity around the world.

the bar, he selected the neurotransmitter he desired and sucked on the butt of the bulky cigar.

BB- "Cowboy, tipping back his whiskey glass. He picked his digital cigar up off

'Aah choose adren-a-line for you little gal. It ain't as good as a line of old-world marching powder, but I got work to do today, I'll save that for our next date,' he said puffing on the smokeless cigar."

BB- "Cowboy's digital cigar fell from his gaping mouth 'Well aint that a pigs dick in the mud,'"

Conclusion - These two devices are alleged to essentially be the same drug administration device, taken in different methods. One ingested and the other injected. Both administer remarkably similar blood-based drugs, both regulate the user to prevent them dying. It should be noted that other characters in Bloodborg take similar blood-based bio-drugs to self-regulate, or to heal, or feed or to stop aging. Many of them take the drugs via injection like Silco, but not in the eye. Yet bionic eyes appear a few times in Bloodborg. Also, in Bloodborg, eye colors change due to these Blood-based bio drugs and afflictions, which is what we later see in Arcane after Jinx is given Shimmer to save her and her eyes turn pink.



18- Meeting Silco.







It is alleged that Silco of Arcane is taken directly from Cowboy Momahan in Bloodborg. The Plaintiff will file a side-by-side detailed comparison of Silco and Cowboy Momahan. In short, both are ruthless underworld gang leaders / kingpins. Slico's men are called Goons. Cowboy's men are called Feral Fighters. Both Cowboy and Silco are working with topside connections (Piltover / Assemblage). Both have vowed to be the King of the underworld (Zaun / New Kowloon). Both have balm naked mole rat like henchmen. Both use blood-based drugs to self-regulate. Both are searching for the parkour runner/person responsible for the explosion of the Key event (Rook/ Vi).

Silco from Bloodborg and Arcane, respectively.

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Psychosis and mental illness as trauma responses in Cowboy Momahan and

In Bloodborg, Cowboy Momahan, the leader of the Feral Fighters, has vowed to unite the gangs, the hunters and raiders of The Needles district, to fight against other districts, for full control of New Kowloon. He has announced that he will be the first King of New Kowloon. He is a narcissistic violent and cruel scrawny rat of a man, barely kept in check with inhaled neurotransmitter drugs. In Arcane Silco demonstrates signs of narcissism and paranoia. His obsession with power and control, along with his delusions of grandeur, reflect deep psychological scars from betrayal and loss. He self regulates in the same way, yet he injects the drug into his eyeball. Silco is a subtle and more poised, dialed down version of Cowboy Momahan.

BB- "Needles is one of the most avoided areas of New Kowloon because a feared gang of lawless wreckers, rapist and murderers patrol the platforms and gangways. They call themselves The Feral Fighters. The leader of the gang; Cowboy Momahan, is attempting to take control of all of The Needle district. He is trying to recruit an army to plunder the city. He receives weapons, alcohol and drugs from the Assemblage in exchange for raiding services and blood donations (trafficking people for their blood)."

J. Blood Based Drugs (Shimmer and Fetal Sapien Serum).

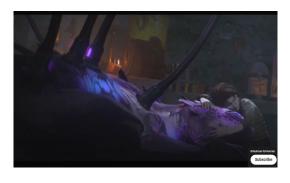


Shimmer, the glowing purple substance in Arcane, is a synthetic chemical drug developed in Zaun by Singed, with the backing of Silco. Its origin lies in Zaunite alchemy and Singed's experiments to create a potent substance with transformative and often dangerous effects.

J1. Inventing Shimmer

Shimmer was originally created by Singed from a species of glowing purple flowers that he found in the caves of Zaun as one of his many attempts to find a way to cure his comatose and terminally ill daughter Orianna. His first known test subject was Rio, his Waverider pet. Singed essentially uses Rio's blood as the foundation for creating Shimmer; he extracted the unique regenerative properties from Rio's mutated biology, which was derived from a species of glowing purple flowers she consumed, to create the drug.





J2. Further development of Shimmer.

Later in the series, we see Singed hunting Greater Murk Wolves to extract their blood to mix it with Shimmer.





Singed then mixes Shimmer with the blood, and perhaps DNA, of Greater Murk Wolves, with his own harvested blood and Zaun green chemicals to turn Zander into a werewolf called Warwick.





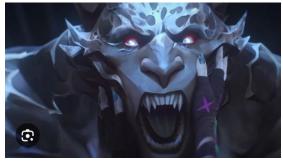


PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

Singed isn't finished yet. In season 2, after Jayce kills Jesus Viktor and Isha kills Vander/ Warwick the werewolf, Singed uses harvested blood of the dead werewolf and the mutated shimmer followers of Viktor and his "Glorious Evolution." Singed pumps the harvested blood into Viktor's egg (D'borg's Egg in Bloodborg), and also back into the werewolf, finally making two Bloodborgs, the "pinnacle of all creation." The first is a werewolf vampire Bloodborg with a gold head. The second is Bloodborg Jesus Viktor.







J3. Bloodborg Viktor and Warwick

It should be noted, both Viktor and Warwick were playable characters in the LOL games. They both had backstories. They have both been retconned to bring them aligned to the new characters and stories of Arcane. The pre-Arcane characters are unrecognizable to the new Bloodborg Viktor and Warwick. Warwick was a werewolf with Zaun Green chemicals powering him. Viktor was a metal man, a "the Machine Herald". Dr Doom type tin man. Below are the pre-Arcane Viktor and Warwick.











J4. Effects of Shimmer compared to Fetal Sapien Serum and its effects

Enhancement: Shimmer grants superhuman strength, speed, and resilience to its users, making it particularly attractive for enforcers, thugs, and soldiers.

For example, Sevika and the Shimmer mutants in the series use it to gain a significant physical edge.

Healing: Shimmer has healing properties, as seen when it helps stabilize critical injuries. For instance, Silco uses it to save Jinx after her near-death experience.

Mutative and Addictive Properties: Prolonged use causes severe side effects, including physical disfigurement, loss of control, and addiction. Shimmer corrupts and deforms its users, as seen with the Shimmer-enhanced thugs.

Connection to Zaun: Shimmer becomes a cornerstone of Silco's empire in Zaun. He uses it not only to consolidate power and fund his ambitions for Zaun's independence but also as a means of control, exploiting its addictive qualities to maintain loyalty among his followers.

Fetal Sapien Serum and its effects: All of the above and more, switch the word shimmer to Fetal Sapien Serum or blood bio-drug. Switch Zaun to New Kowloon. Switch Silco to Cowboy Momahan.

J5. Purple Blood- Cultural Sensitivity and Censorship.



In Bloodborg, some but not all of the Fetal Sapien Serum looks like blood (Red), especially when it is drunk or being mass harvested in colossal tanks shipped from war zones.

In Arcane, Shimmer is mostly purple, but sometimes red blood is shown being harvested.

Riot Games are owned by Tencent, a Chinese tech conglomerate. Riot Games hve a massive following in the east. Indeed, Tencent paid Riot Games 3 million dollars per episode to distribute Arcane in the east. In some Asian markets, especially in places like China, Japan, or other countries, there is often stricter guidelines around what is deemed acceptable in visual media, including anime, video games, or even movies. Purple blood is often used as a way to soften the impact of violent scenes without diminishing the emotional or dramatic effect of the visuals. It allows the creators to still convey injury, conflict, and action while sidestepping more direct depictions of realistic red blood that could be considered inappropriate or too graphic for younger audiences or certain cultural norms. This technique has been used in various games, cartoons, and anime to meet these regional standards. It is not uncommon for animations

intended for global audiences to alter certain elements to fit the expectations and regulations of different markets.

Arcane's use of the blood drug is heavy. It is central to the plot. Thus, making it Purple in all markets saves endless time editing the red blood to purple. The Purple blood drug may have been a smart visual choice made in part to appeal to or meet the requirements of specific regional standards, especially as they are targeting broader international audiences. However, the use of purple for magical elements, like Hextech crystals and their glowing energy, is more consistent with the aesthetic of the show as a whole. The use of purple in these cases also enhances the sense of mysticism and danger associated with Hextech. But in general, purple blood can be a strategic choice for East Asian audiences to avoid the direct depiction of red blood, while still maintaining the intensity of the many scenes.

In 2020, it was reported "Riot to remove blood for Valorant esports."

https://www.pcgamesinsider.biz/news/70931/riot-to-remove-blood-for-valorant-

esports/

Riot Games have had to use purple many times to mask blood in images of characters, for the eastern audience appeal. Below are a few examples.















PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

Interesting side note, in addition to the blood censorship, Arcane has faced

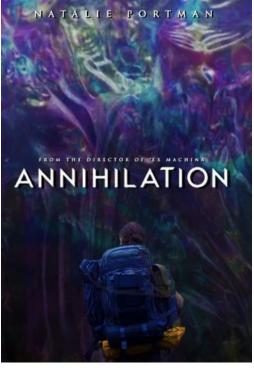
censorship in various Eastern countries, particularly concerning its portrayal of LGBTQ+ relationships and other sensitive content. In China, the depiction of LGBTQ+ relationships in media is often restricted. Reports indicate that scenes suggesting a romantic relationship between characters Vi and Caitlyn were censored or altered in the Chinese version of Arcane. This includes the removal or modification of scenes that imply a romantic connection between the two characters. In several Middle Eastern nations, content deemed offensive to Islamic values is subject to censorship. Authorities in these regions have demanded that platforms like Netflix remove content that contradicts Islamic teachings.

J6. The Name Shimmer

The Shimmer is the main antagonist of the science fiction horror mystery book

Annihilation and its 2018 film adaptation.





J7. "Glorious evolution."

In my Bloodborg Manuscript: This serum is still being perfected with experimentation, like it is in Arcane. In Bloodborg the finished product is called Fetal Sapien Serum, but it looks and is used differently in different locations and settings. Cowboy Momahan & the members of the Assemblage Defence (Silco & Enforcers). Are gathering as much blood variance and other chemicals as they can to produce Fetal Sapien Serum (Shimmer). In Bloodborg they are producing synthetic blood from harvesting real blood and making it continually reproduce itself in bionic bodies to produce Bloodborg, the pinnacle of all creation.

It is alleged that Riot Games (Showrunners) saw this line "Bloodborg, the pinnacle of all creation" and saw this as an opportunity to feed in their "Treasure Gateway," the voice line "Glorious evolution."

J8. A few examples of Fetal Sapien Serum In Bloodborg.

- 1, Then during the after wars, all of the Ark scientists were focused on repairing and improving soldiers for battle. Bionics and cyborgs seemed to be a much faster and easier way of repairing injured soldiers or making reliable new ones from the mangled remains of deceased and dying humans.
- 2, Lawlessness grew from the chemical ashes. Insanity spread within the fumes of war. Mutation and disease plagued the streets.
- 3, 'Only the ones with rare proteins, and enzymes and immune cells and DNA,' said Raven Duke, sagging back against the elevator wall.

1	4, 'The science people from the Assemblage, the one's that visit Cowboy	
2	Momahan.'	
3	5, The techie science guys have been coming over to teach Cowboy's men how to	
5	use the blood identifying machines, they plan to sieve through the whole city, looking for buyable	
6	blood,'	
7	6, is it right for us to be chemically controlled, chemically sedated to sleep.	
8	Chemically fed, chemically pacified, chemically repaired. Will those chemicals repair my mind	
9	when all this is over.	
0	7,control them with chemical substances and	
1		
2	8, She lowered her head, her body responded with human emotion, it felt	
3	painful she longed for more. Her integrated homeostasis detector flooded this emotion away	
14	with a release of chemicals to block the receptors in her brain.	
16	9, There low morals and excessive use of chemical highs meant that Cowboy	
17	Momahan could effortlessly control them.	
8	10, I picked up my Nelson and aimed it at him. He lifted his head forward, his	
9	Vada In-brain had obviously fed him a batch of Mr evil chemicals, because his face had turned	
20	back to the crazed fiend it had been before.	
21	11, He was still given serum jabs by the guards every day	
22	12, The Fetal Sapien Serum dispenser buzzed.	
23 24	13, Three doses of Fetal Sapien Serum delivered, to be consumed instantly	
25	14, A line of escaping blood-red serum dripped down Ruby's chin. 'Ahh,'	
26		
27	exclaimed the three of them, rejuvenated.	
28	98	

15, Rook gasped for air. Ink-stained purple fingers prodded the swollen cheek of the veiled face in the mirror.

16, Fighters are planning something to identify blood markers instantly, so they don't have to rely on this dipping fingertip in permanent purple ink business.

17, A green fluid drips from one pipe, purple fluid from another, heating the ground below. The scorched earth below the drip has melted into a pool of muddy grey soup.

The soup contains miniature monsters of slithering microbial movement, just about visible to my naked eye. (The wall is also alive).

J9. Shimmer and Fetal Sapien Serum Conclusion.

In Arcane, Shimmer is a serum-like substance made with powerful plant juice and the blood of an animal. Shimmer is mixed with human blood, and animal, and werewolf variance which have been harvested. When consumed, shimmer makes the user superhuman. It is purple in color. Shimmer takes many forms. Shimmer is also used to give Jinx her vampire-like abilities and it keeps her alive. Shimmer is used by Silco to self-regulate and stop toxins from killing him. Shimmer is mixed with other chemicals to use as synthetic highs, or street drugs. Shimmer is used by Viktor to help him heal from his disabilities. Viktor later mixes Shimmer and Hex to make Hextech. His Shimmer and Hex inflicted blood drips onto the Hex Crystal in the Hexgate basement core, causing the anomaly and making a wild rune thing. Later, to save Viktor from Jayce's attack, Shimmer and blood is used to make Viktor and Warwick into Bloodborgs.

In Bloodborg, Fetal Sapien Serum is a serum-like substance which takes many forms. It's made from blood engineering and chemicals and plant root extracts. Mass harvesting is taking place to collect the blood. When consumed, it does all that we have prementioned in the Arcane section. A perfect "Bloodborg, the pinnacle of all creation." It hasn't yet been achieved also many, most, are using Fetal Sapien Serum.

Shimmer and Fetal Sapien Serum are both the central plot points in which the whole stories revolve around and indeed evolves around... literally.

The Major differences between Shimmer and Fetal Sapien Serum.

The color

The name

Fetal Sapien Serum is much more plausible, possible, more scientific, less convoluted and all round much better.

Pros of Shimmer, it is more cultural sensitivity to the eastern audiences

K. Conclusion to CONTENT OWNERSHIP COMPARISON- BLOODBORG: THE HARVEST & ARCANE SEASON 1, EPISODE 1.

This is just one episode, all that has been listed, evidenced, analyzed, explained and evaluated, accounts for every scene, every central plot point set-up to the end of the first act of a three-act structure (First Plot Point), every major character we've seen in episode 1, and even the aesthetics, character arcs, narrative choices, technologies, traumas, motivations, character designs, backstories, worldbuilding, names of places, the themes, tone, emotional temperament, the key undercurrent of oppression, divide, diversity, duality, loss, poverty, trauma and of course the metaphors of PTSD and trauma intrusions, nightmares and reliving, represented by the cyclical and mirrored storytelling underpinning the whole narrative.

Furthermore, Even the allegory of "Bleeding the world dry." is the same in both works, or should I say remarkably similar.

Additionally, and the worst of all of this is, The Bloodborg manuscript is a direct representation and allegorical fictional retelling of the Plaintiff's actual real-life traumas and loss and grieving.

From just episode one, the plaintiff has shown 100s of extracts of evidence, from tiny line-by-line fine details to macro story structure. The Plaintiff has shown how, from just this one episode, the framework of the whole story is made, a third of the structure is achieved and the whole plot is set in motion. After the first act, a story is mostly letting the dominos fall in place.

PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PURSUANT

L. Plaintiff declaration.

All that has been presented here, in this document, has taken weeks to collaborate. 21 days of working non-stop days and nights, to be precise. To be more precise, 2220 minutes, or around 37 hours. The Plaintiff has also been simultaneously working on other documents and evidence for these proceedings. This accounts for a small fraction of the comparisons and evidence to come.

The Plaintiff has already spent far longer on pre-litigation disputes and building evidence and court papers, then it took him to write Bloodborg. This all adds stress and emotional harm. The Plaintiff shouldn't have to fight endlessly to stop oppressive cheaters from violating him and his trauma writing.

I, Marc Wolstenholme, the Plaintiff, ask the court, and the Judges to take this further hardship and emotional toil into consideration when considering all forms of relief and punishments for the four cases. It is now 2:15 am in The Uk and I still have to edit and proofread this document. My eyes and brain are burning, and I'm tired. Tired of always fighting for justice and what is right, tired of cheaters and bullies. Something more than just monetary compensation should be considered to prevent this reckless disregard for others, and to prevent re-offending. Many Thanks,

The Plaintiff, Marc Wolstenholme,

Date: FEBRUARY 09, 2025

Signed: M.WOLSTENHOLMC.

Analysis & Evaluation of Episode 1 Evidence

Analysis

The evidence provided for Episode 1 aims to demonstrate substantial similarities between Bloodborg: The Harvest and Arcane in narrative structure, plot elements, character arcs, thematic resonance, and even stylistic techniques. The plaintiff alleges that Arcane employed a "Pix N Mix" method of creative appropriation—taking individual narrative pieces from Bloodborg, rearranging them, and incorporating them into the animated series while modifying their context.

Key areas of concern highlighted in the document include:

Setting & Worldbuilding: The thematic and environmental parallels between Bloodborg and Arcane, particularly in terms of social stratification, urban decay, and oppressive regimes.

Inciting Incidents & Character Parallels: Strong similarities in the traumatic events that set the protagonist's journeys into motion, particularly the deaths of Vi's parents in Arcane and Rook's in Bloodborg.

Parkour & Combat Sequences: Detailed scene-by-scene comparisons indicate similarities in movement, action sequences, and overall scene execution.

Technology & Magic Systems: The argument that Arcane's Hextech system, particularly the blue energy crystals, mirrors Bloodborg's BlueBeam technology.

DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 2: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

Structural Similarities: Use of nonlinear storytelling, interwoven perspectives, and cyclical trauma-driven narratives that the plaintiff claims were unique to Bloodborg and his own trauma.

Evaluation

The plaintiff presents a well-structured argument supported by direct textual comparisons, thematic analysis, and references to the show's production timeline. The document highlights the inconsistencies in Arcane's development history, with an emphasis on late-stage restructuring and writing issues, which, according to the plaintiff, indicate that elements from Bloodborg were incorporated into the final product.

However, while the allegations of similarity are substantial, legal standards for copyright infringement require proof of substantial similarity and access. The argument for access is less explicit in the document but is implied through references to literary agencies, industry connections, and possible unauthorized access to unpublished work. If evidence of direct access can be firmly established, the case for copyright infringement becomes significantly stronger.

Conclusion

The plaintiff provides compelling arguments and an extensive comparative analysis of Episode 1, demonstrating significant narrative and thematic parallels between Bloodborg and Arcane. The claim that Arcane's foundational structure, characters, and world

DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 2: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE

1	elements were derived from Bloodborg is supported by textual analysis and production		
2	inconsistencies.		
3			
4	Legal Citations Supporting the Plaintiff's Claims		
5			
6	To support the claims of copyright infringement, the following legal principles		
7	and case law may be relevant:		
8			
9	Substantial Similarity Test (Extrinsic & Intrinsic)		
10			
11			
12	Sid & Marty Krofft Television Prods., Inc. v. McDonald's Corp., 562 F.2d 1157		
13	(9th Cir. 1977)		
14	Litchfield v. Spielberg, 736 F.2d 1352 (9th Cir. 1984)		
15	These cases set the framework for determining substantial similarity through		
16	objective and subjective analysis.		
17			
18			
19	Access & Independent Creation		
20			
21	Three Boys Music Corp. v. Bolton, 212 F.3d 477 (9th Cir. 2000)		
22	Demonstrates that access to an unpublished manuscript strengthens a copyright		
23			
24	claim.		
25	Idea-Expression Dichotomy		
26			
27	3		
28	DETAILED BREAKDOWN AND ANALYSIS OF EPISODE 2: SUPPORTING EVIDENCE FOR COPYRIGHT INFRINGEMENT CASE		

1	F	eist Publications, Inc. v. Rural Telephone Service Co., 499 U.S. 340 (1991)	
2	R	einforces that general ideas are not protected, but unique expression is.	
3			
4			
5	T T	ragmented Literal Similarity	
6			
7	V	Villiams v. Crichton, 84 F.3d 581 (2nd Cir. 1996)	
8	A	Addresses cases where smaller but distinct elements of one work appear in	
9	another.		
0	S	Substantial Similarity in Film & TV	
1		uosianiai similai tiy in 1 tim & 17	
12			
13	S	heldon v. Metro-Goldwyn Pictures Corp., 81 F.2d 49 (2d Cir. 1936)	
4	Н	lighlights similarities in dramatic structure as a basis for infringement.	
15	D	Derivative Work & Unauthorized Adaptation	
16			
17	_	anderson v. Stallone, 11 U.S.P.Q.2D (BNA) 1161 (C.D. Cal. 1989)	
18			
19	A	Addresses situations where one work is adapted into another without permission	
20	Т	these cases can serve as a foundation to substantiate the legal arguments	
21	surrounding Arcane's alleged infringement of Bloodborg. Further documentary evidence—suc		
22	as timestamps on submitted manuscripts, correspondence records, and expert analysis—would		
23	strengthen the plaintiff's position.		
24	strengthen the pr		
25 26			
27		4	
28	DETAILED BR	EAKDOWN AND ANALYSIS OF EPISODE 2: SUPPORTING EVIDENCE FOR COPYRIGHT	